

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DEPUTY ADMINISTRATOR

Mr. Dexter R. Brooks  
Director of Federal Sector Programs  
U.S. Equal Employment Opportunity Commission  
Office of Federal Operations  
P.O. Box 77960  
Washington, D.C. 20013

Dear Mr. Brooks:

The U.S. Environmental Protection Agency last year took significant steps toward improving our civil-rights programs, and I have enclosed for you the EPA's *2010 Management Directive 715 Report*. It features work-force-profile data, our analyses and the EPA's action plans designed to help us achieve a model Equal Employment Opportunity program.

EPA Administrator Lisa P. Jackson and I, along with other senior leadership, have been actively engaged in efforts to improve and enhance our civil-rights and diversity programs, and we are charting a new course for the Office of Civil Rights. The action we have taken includes selecting new leadership for OCR, retaining the assistance of external consultants to help improve the program's efficacy, and working with staff to spur a renewed commitment to timeliness, quality and personal accountability.

With the change in OCR's management, the EPA made important progress in addressing a number of issues identified in last year's *Management Directive 715 Report* and in the Equal Employment Opportunity Commission's letter dated September 28, 2010.

We look forward to continuing to partner with the EEOC. Should you have any questions or comments, please contact Rafael DeLeon, director of the Office of Civil Rights, at (202) 564-7272 or [deleon.rafael@epa.gov](mailto:deleon.rafael@epa.gov).

Sincerely,

Bob Perciasepe



**United States  
Environmental Protection Agency**

# **MD 715 Report Fiscal Year 2010**



*Protecting Human Health and the Environment*



**For period covering October 1, 2009 to September 30, 2010.**

<b>PART A</b> Department	<b>1. Agency</b>	<b>1. U.S. Environmental Protection Agency</b>		
or Agency Identifying Information	1.a. 2nd level reporting component	N/A		
	1.b. 3 <sup>rd</sup> level reporting component	N/A		
	1.c. 4th level reporting component	N/A		
	<b>2. Address</b>	<b>2. 1200 Pennsylvania Avenue, NW</b>		
	<b>3. City, State, Zip Code</b>	<b>3. Washington, DC 20460</b>		
	<b>4. CPDF Code</b>	<b>5. FIPS code(s)</b>	<b>4. EP</b>	<b>5. 11</b>
<b>PART B</b> Total	1. Enter total number of permanent full-time and part-time employees			<b>1. 17,179</b>
Employment	2. Enter total number of temporary employees			<b>2. 1,611</b>
	3. Enter total number employees paid from non-appropriated funds			<b>3. 0</b>
	<b>4. TOTAL EMPLOYMENT [add lines B 1 through 3]</b>			<b>4. 18,790</b>
<b>PART C</b> Agency Official(s)	<b>1. Head of Agency Official Title</b>	<b>1. Lisa P. Jackson, Administrator Environmental Protection Agency</b>		
Responsible For Oversight of EEO Program(s)	<b>2. Agency Head Designee</b>	<b>2. Robert Perciasepe, Deputy Administrator U.S. Environmental Protection Agency</b>		
	<b>3. Principal EEO Director/Official Official Title/series/grade</b>	<b>3. Rafael DeLeon, Director Office of Civil Rights, SES</b>		
	<b>4. Title VII Affirmative EEO Program Official</b>	<b>4. Vacant</b>		
	<b>5. Section 501 Affirmative Action Program Official</b>	<b>5. Christopher Emanuel Diversity Employment Program Manager</b>		
	<b>6. Complaint Processing Program Manager</b>	<b>6. Ronald Ballard, Assistant Director Employment Complaints Resolutions Division</b>		
	<b>7. Other Responsible EEO Staff</b>	<b>Mirza P. Baig, National Affirmative Employment Program Manager</b>		
		<b>William Haig, National Reasonable Accommodations Coordinator</b>		



EEOC FORMS and Documents include in this report			
*Executive Summary [FORM 715-01 PART EI, that includes:	X	*Optional Annual Self-Assessment Checklist Against Essential Elements [FORM 715-01 <b>PART GI</b>	X
Brief paragraph describing the agency's mission and mission-related functions	X	*EEO Plan To Attain the Essential Elements of a Model EEO Program [FORM 715-01 PART HI for each programmatic essential element requiring improvement	X
Summary of results of agency's annual self-assessment against MD-715 "Essential Elements"	X	*EEO Plan To Eliminate Identified Barrier [FORM 715-01 <b>PART II</b> for each identified barrier	X
Summary of Analysis of Work Force Profiles including net change analysis and comparison to RCLF	X	*Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals With Targeted Disabilities for agencies with 1,000 or more employees [FORM 715-01 <b>PART JI</b>	X
Summary of EEO Plan objectives planned to eliminate identified barriers or correct program deficiencies	X	*Copy of Workforce Data Tables as necessary to support Executive Summary and/or EEO Plans	X
Summary of EEO Plan action items implemented or accomplished	X	*Copy of data from 462 Report as necessary to support action items related to Complaint Processing Program deficiencies, ADR effectiveness, or other compliance issues.	X
*Statement of Establishment of Continuing Equal Employment Opportunity Programs [FORM 715-01 <b>PART FI</b>	X	*Copy of Facility Accessibility Survey results as necessary to support EEO Action Plan for building renovation projects	N/A
*Copies of relevant EEO Policy Statements	X	*Organizational Chart	X

U. S. Environmental Protection Agency

For period covering October 1, 2009 to September 30, 2010.

## EXECUTIVE SUMMARY

### **Agency Mission**

The mission of EPA is to protect human health and the environment. EPA's purpose is to ensure that all Americans are protected from significant risks to human health and the environment where they live, learn and work. To accomplish this mission, we partner with federal, state and local stakeholders to enforce the nation's environmental laws and regulations; conduct world class research; provide financial assistance to state recipients and grantees in support of environmental programs and employ a highly-educated and diverse workforce. EPA values diversity. Our EEO and diversity programs enhance workplace unity and are a smart business practice. In 2010, EPA continued to work toward building a better, stronger equal employment opportunity program based on EEOC's Six Essential Elements of a Model EEO Program.

### **Summary of the Results of the Agency's Annual Self-Assessment**

The Office of Civil Rights (OCR) was an office in transition in 2010. Upon the recognition of several management challenges, the agency took a number of significant steps to chart a new course for OCR. The agency selected a new Director and Assistant Director to strengthen the leadership of the office and improve the agency's civil rights program. In addition, EPA procured the assistance of an outside consultant to help identify the structural, managerial and personnel challenges facing OCR, and to make recommendations to guide our rebuilding efforts. Once these recommendations are received, the agency will commit additional resources. The agency also hired another outside management consultant to help OCR's new management team implement changes to the way OCR conducts business. The agency recognizes that this is a long-term rebuilding process. Nevertheless, the agency is committed to continual improvement and to make the necessary changes to establish a Model EEO Program.

With the change in OCR's management, EPA made significant progress in addressing and correcting a number of deficiencies identified in last year's MD-715. As detailed below, the agency accomplished modest successes in its discrimination complaints processing, in its training of employees and managers and in its collection and use of applicant flow data.

## **Summary of Analysis of Workforce Profile**

### **Total Workforce**

At the close of FY 2010, EPA employed 17,179 full/part time permanent and 1,611 temporary employees for a total of 18,790 employees. There was a net increase of 153 full/part time permanent employees during FY 2010.

Males comprised 48.1% (8,271) of the permanent workforce as compared to 53.2% of the national civilian labor force (CLF). Females comprised 51.9% (8,908) of the workforce as compared to 46.8% of the CLF.

### **Representation of Class Groups**

The data in Table AI shows the workforce profile for permanent employees:

- White men comprised 37.4% (6,434) of the workforce compared to 39.0% of the CLF; this representation reflects a net increase of 8 employees compared to last year.
- White women comprised 31.1% (5,336) of the workforce compared to 33.7% of the CLF; this representation reflects a net increase of 75 employees compared to last year.
- Black men comprised 4.4% (761) of the workforce compared to 4.8% of the CLF; this representation reflects a net increase of 9 employees compared to last year.
- Black women comprised 13.6% (2,335) of the workforce compared to 5.7% of the CLF; this representation reflects a net decrease 10 employees compared to last year.
- Hispanic men comprised 2.6% (442) of the workforce compared to 6.2% of the CLF; this representation reflects a net increase of 13 employees compared to last year.
- Hispanic women comprised 3.1% (531) of the workforce compared to 4.5% of the CLF; this representation reflects a net increase of 5 employees compared to last year.
- Asian men comprised 3.0% (515) of the workforce compared to 1.9% of the CLF; this representation reflects a net increase of 23 employees compared to last year.
- Asian women comprised 3.1% (541) of the workforce compared to 1.7% of the CLF; this representation reflects a net increase of 15 employees compared to last year.
- Native Hawaiian men comprised 0.05% (9) of the workforce compared to 0.1% of the CLF; this representation reflects no change as compared to last year.
- Native Hawaiian women comprise 0.1% (11) of the workforce compared to 0.1% of the CLF; this representation reflects no change as compared to last year.
- American Indian men comprised 0.3% (49) of the workforce compared to 0.3% of the CLF; this representation reflects a net decrease of 1 employee compared to last year.
- American Indian women comprised 0.4% (68) of the workforce compared to 0.3% of the CLF; this representation reflects a net decrease of 2 employees compared to last year.

- People with Targeted Disabilities comprised 1.34% (231) of the total workforce compared to the federal-wide goal of 2.0%; this representation reflects a net decrease of 4 employees compared to last year.

- Individuals in our workforce reporting some type of disability comprise 6.76% of the workforce; this representation reflects a net decrease of 19 employees compared to last year.

### **Barriers Identified**

In its letter dated September 28, 2010, the EEOC suggested that the agency focus on the following four areas for our barrier analysis: 1) the representation of women in grades 13-15 and in the Senior Executive Service; 2) the representation of Black females in senior-level positions, (i.e. GS 13-GS 15); 3) the representation of Hispanic males and Hispanic females and 4) the representation of individuals with targeted disabilities.

Using the guidance provided by the EEOC on Barrier Identification and Elimination, the Affirmative Employment Division of the Office of Civil Rights (AED) reviewed workforce statistical data on a quarterly basis, (see Part H form on page (pg.) 23 of 2009 report). The EPA also conducted an analysis of the workforce by reviewing the available data and comparing its workforce representation to the CLF (above). The agency then analyzed the participation rates, application rates, qualification rates and selection rates for some of the agency's major and/or mission critical occupations for the groups listed above. Those results are found in the attached Part I and J forms. Please note that the Office of Civil Rights conducted additional analyses for other employee groups also found in the Part I forms. As discussed below, EPA is committed to improving the quality and quantity of applicant flow data and the analyses of its mission critical occupations and senior-level positions.

### **Summary of EEO Plan Objectives to a Model EEO Program**

In response to the EEOC's guidance in September 2010, the plans developed in this report address the triggers and barriers to equal employment opportunity contained in the agency's 2009 MD 715 Parts H and I. Specifically, EPA is implementing an oversight and monitoring structure to facilitate the timely processing of all steps in the EEO complaint process (counseling through forwarding necessary files to EEOC). The agency will reissue to all employees and managers the agency's policy which requires management participation in ADR, absent extraordinary circumstances. The agency also plans to improve ADR information sharing, outreach and training. We believe these efforts also will improve the relatively low participation rate by employees and applicants that EEOC asked us to address last year. To measure its progress, EPA will monitor the use of ADR on a quarterly basis.



On the recruitment, hiring and diversity front, the agency has undertaken the following two initiatives. First, EPA is revising and updating its Outreach and Recruitment Strategy. This effort is led by the Office of Human Resources. In addition, in early 2010, the Administrator established the Office of Outreach, Diversity and Collaboration. This office was created to achieve greater cooperation and coordination among the programs, initiatives and mandates of the Office of Human Resources and the Office of Civil Rights. Led by the Office of Administration and Resources Management, both of these initiatives will reflect input from multiple regional and HQ stakeholders, including the Office of Diversity Outreach and Collaboration, Office of Human Resources, the Office of Civil Rights and the Office of General Counsel, as appropriate.

To help measure the results of its recruitment, hiring and employee development efforts, the agency is improving the collection and analyses of applicant flow data. These improvements will address the collection of application, qualification and selection data for the agency's major occupations, mission critical occupations and positions in the Senior Executive Service (SES). For example, the agency's Executive Resources Division in the Office of Human Resources has committed to developing an automated application system to capture applicant flow data for internal and external SES positions. EPA anticipates implementing this process by December 2011.

The agency intends to conduct its regularly scheduled, bi-annual EEO training for managers, which has been provided by the EEOC in previous years. EPA will continue to evaluate and modify, as necessary, its training to ensure that employees and managers are fully informed of their rights and responsibilities with respect to equal employment opportunity.

As evidenced by this year's report, EPA is committed to ensuring the timely filing of the MD 715. Senior management at the agency has made filing the MD 715 Report a top priority for the new management team in OCR. This is evidenced by identifying sufficient resources to allow OCR to attend advanced MD 715 training in April 2010, (*see Part Hon pg. 29 of 2009 report*).

### **Summary of MD-715 Action Items Implemented and Accomplished**

EPA is pleased to report that beginning in 2010, the agency updated its EEO policy statement and began to distribute it to all new employees at orientation, (*see Part H pg. 30 of 2009 report*). The agency also provided the statement to all newly promoted supervisors through the use of an agency portal dedicated solely to managers. In addition, the agency posted its EEO policy statement on both the internal and external EPA websites. Of particular note in 2010, approximately 95% of all EPA employees took the "No FEAR" training by the December 31, 2010 deadline. This was up 10% from when it was last given in 2008.

As described above, during fiscal year 2010, EPA made significant strides in improving the collection of applicant flow data. As evidenced by the analyses in this report, this enabled the agency for the first time to analyze application, qualification and selection rates. This information allows the agency to create and tailor plans for investigating the cause of any

lower than anticipated application, qualification or selection rates. As a result of the increased attention on ensuring accurate applicant flow data, the Office of Civil Rights and the Office of Human Resources met several times over the course of the year and are collaborating on developing a plan to better manage and integrate HR and EEO data systems (see Part H form on pg. 23 of 2009 report).

In 2010, EPA developed a harassment policy that also addresses the prevention of sexual harassment. The agency is also developing enhanced procedures for processing harassment complaints. These documents are currently under internal review and the agency anticipates publishing them by June 2011. The agency also amended its complaint investigation procedures to allow complaints on the basis of sexual orientation to be accepted, investigated and adjudicated within OCR, (see Part H on pg. 26 of 2009 report).

EPA significantly improved the timeliness of the EEO counseling process. As indicated in the 2010 EEOC 462 report, pre-complaint counseling was completed within regulatory timeframes. In addition, EPA secured sufficient funding to implement all aspects of its civil rights program.

The agency also began reviewing its merit promotion, rewards/recognition and training development programs, including reviewing them for systemic barriers, (see Part H on pg. 27 of 2009 report). The Office of Human Resources, the Office Diversity Outreach and Collaboration and Office of Civil Rights partnered to establish timelines for these initiatives.

With respect to the Disability Program, the National Disability Employee Program Manager, in conjunction with staff from the Human Resources Office, regularly briefs senior managers throughout EPA headquarters about special hiring authorities including Schedule A. Additionally, the agency provided Schedule A training to managers, EEO Officers and other organizational components. The EPA also resurveyed its workforce regarding disability status to reflect accurately the number of persons with disabilities in the agency. Further, the EPA reviewed and revised, as appropriate, its reasonable accommodation procedures in light of the Americans with Disabilities Amendments Act of 2008 and Genetic Information Nondiscrimination Act (GINA). In partnership with the Department of Defense and Department of Labor, the EPA continues to support the Workforce Recruitment Program for College Students with Disabilities (for example, our employees serve as recruiters and advocates for the program). The agency used hiring flexibilities, including Schedule A, to hire permanent and temporary employees and interns. The EPA is also a major sponsor of the national Perspectives Conference for Individuals with Disabilities.

Additionally, EPA continued its support of recruitment and outreach efforts by partnering with a variety of external organizations. For example, the agency sponsored discussions on environmental issues at the Minority Serving Institutions Research Partnership Consortium Conference, (see Part I on pg. 33 in 2009 report). The agency also continued its financial assistance and support for student training programs in collaboration with 12 major universities, including 2 historically black universities. The Agency also became a member of the Federal Interagency Diversity Partnership (FIDP). The FIDP is comprised

of more than 20 agencies across the federal government. The mission of the partnership is to promote a shared commitment to inclusiveness and diversity through the distribution of information, knowledge development and the advancement of strategies among colleagues government-wide.

Finally, a new Director of Civil Rights was temporarily assigned in June 2010 and permanently appointed in December 2010. He and the former Director each briefed the agency's Human Resource Council (HRC) in June and October 2010 regarding the state of EEO issues. (See Part H on pg. 24 of the 2009 report.) The HRC is composed of agency senior managers, employee affinity groups and the unions. Since then the new Director has spent considerable time engaging EPA's senior managers on EEO matters, including observances, training and EEO settlements.

The Director meets bi-weekly with the agency's Chief of Staff and, as needed, with the Administrator and Deputy Administrator, among others. EPA charted a new direction for our Civil Rights program. Given the significant challenges that exist with this program, restructuring will require time. We look forward to continuing to partner with EEOC to create a model EEO program at EPA to support our employees as they work to protect human health and the environment.





U. S. Environmental Protection Agency

For period covering October 1, 2009 to September 30, 2010.

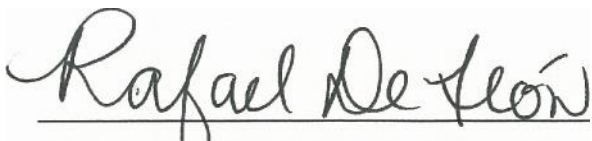
CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY  
PROGRAMS

I, Rafael DeLeon, Director of Civil Rights, Senior Executive Service, am the Principal EEO Director/Official for the US Environmental Protection Agency.

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

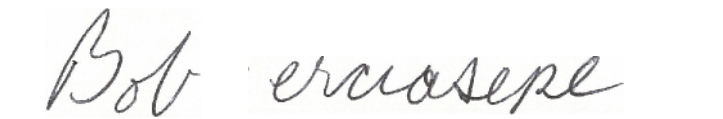
I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.



Signature Principal EEO Director/Official  
Certifies that this Federal Agency Annual EEO Program  
Status Report is in compliance with EEO MD-715.

1/26/2011

Date



Signature of Agency Head or Agency Head Designee

1/26/2011

Date

**Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP**

Requires the agency head to issue written policy statements ensuring a workplace free of discriminatory harassment and a commitment to equal employment opportunity.

Compliance Indicator		Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
" Measures	EEO policy statements are up-to-date.	Yes	No	
The Agency Head was installed on January 22, 2009. The EEO policy statement was issued on September 30, 2009 and updated on September 29, 2010. Was the EEO policy Statement issued within 6 - 9 months of the installation of the Agency Head? If no, provide an explanation.		X		
During the current Agency Head's tenure, has the EEO policy Statement been re-issued annually? If no, provide an explanation.		X		
Are new employees provided a copy of the EEO policy statement during orientation?		X		
When an employee is promoted into the supervisory ranks, is s/he provided a copy of the EEO policy statement?		X		
Compliance Indicator	EEO policy statements have been communicated to all employees.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
* Measures		Yes	No	
Have the heads of subordinate reporting components communicated support of all agency EEO policies through the ranks?		X		
Has the agency made written materials available to all employees and applicants, informing them of the variety of EEO programs and administrative and judicial remedial procedures available to them?		X		
Has the agency prominently posted such written materials in all personnel offices, EEO offices, and on the agency's internal website? [see 29 CFR §1614.102(b)(5)]		X		

Compliance Indicator	Agency EEO policy is vigorously enforced by agency management.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	
Are managers and supervisors evaluated on their commitment to agency EEO policies and principles, including their efforts to:		X		
resolve problems/disagreements and other conflicts in their respective work environments as they arise?		X		
address concerns, whether perceived or real, raised by employees and following-up with appropriate action to correct or eliminate tension in the workplace?		X		
support the agency's EEO program through allocation of mission personnel to participate in community out-reach and recruitment programs with private employers, public schools and universities?		X		
ensure full cooperation of employees under his/her supervision with EEO office officials such as EEO Counselors, EEO Investigators, etc.?		X		
ensure a workplace that is free from all forms of discrimination, harassment and retaliation?		X		
ensure that subordinate supervisors have effective managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications ?		X		
ensure the provision of requested religious accommodations when such accommodations do not cause an undue hardship?		X		
ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?		X		
Have all employees been informed about what behaviors are inappropriate in the workplace and that this behavior may result in disciplinary actions?		X		
Describe what means were utilized by the agency to so inform its workforce about the penalties for unacceptable behavior.				
Have the procedures for reasonable accommodation for individuals with disabilities been made readily available/accessible to all employees by disseminating such procedures during orientation of new employees and by making such procedures available on the World Wide Web or Internet?		X		
Have managers and supervisor been trained on their responsibilities under the procedures for reasonable accommodation?		X		

Essential	Element B: INTEGRATION OF EEO INTO THE AGENCY'S	MISSION	
Requires that the agency's discrimination in any of	EEO programs be organized and structured to maintain the agency's policies, procedures or practices and supports	a wocdplace	that is free from strategic mission.
Compliance Indicator		Measure has been met	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures	The reporting structure for the EEO Program provides the Principal EEO Official with appropriate authority and resources to effectively carry out a successful EEO Program.	Yes	No
Is the EEO Director under the direct supervision of the agency head? [see 29 CFR §1614.102(b)(4)] For subordinate level reporting components, is the EEO Director/Officer under the immediate supervision of the lower level component's head official? (For example, does the Regional EEO Officer report to the Regional Administrator?)		X	
Are the duties and responsibilities of EEO officials clearly defined?		X	
Do the EEO officials have the knowledge, skills, and abilities to carry out the duties and responsibilities of their positions?		X	
If the agency has 2~d level reporting components, are there organizational charts that clearly define the reporting structure for EEO programs?		N/A	
If the agency has 2nd level reporting components, does the agency-wide EEO Director have authority for the EEO programs within the subordinate reporting components?		N/A	
If not, please describe how EEO program authority is delegated to subordinate reporting components.			
Compliance Indicator	The EEO Director and other EEO professional staff responsible for EEO programs have regular and effective means of informing the agency head and senior management officials of the status of EEO programs and are involved in, and consulted on, management/personnel actions.	Mea sure has bee n	For all unmet measures, provide a brief explanation in the space below or complete and attach an 5 EEOC FORM 715-01 -01 PART H to the agency's status report
Measures		Yes	
Does the EEO Director/Officer have a regular and effective means of informing the agency head and other top management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program?		X	
Following the submission of the immediately preceding FORM 715-01, did the EEO Director/Officer present to the head of the agency and other senior officials the "State of the Agency" briefing covering all components of the EEO report, including an assessment of the performance of the agency in each of the six elements of the Model EEO Program and a report on the progress of the agency in completing its barrier analysis including any barriers it identified and/or eliminated or reduced the impact of?		X	



Are EEO program officials present during agency deliberations prior to decisions regarding recruitment strategies, vacancy projections, succession planning, selections for training/career development opportunities, and other workforce changes?		X		
Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions such as re-organizations and re-alignments?		X		
Are management/personnel policies, procedures and practices examined at regular intervals to assess whether there are hidden impediments to the realization of equality of opportunity for any group(s) of employees or applicants? <b>[see 29 C.F.R. § 1614.102(b)(3)]</b>		X		
Is the EEO Director included in the agency's strategic planning, especially the agency's human capital plan, regarding succession planning, training, etc., to ensure that EEO concerns are integrated into the agency's strategic mission?		X		
<b>Compliance Indicator</b>		<b>Measure has been met</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
<b>* Measures</b>	<b>The agency has committed sufficient human resources and budget allocations to its EEO programs to ensure successful operation.</b>	<b>Yes</b>	<b>No</b>	
Does the EEO Director have the authority and funding to ensure implementation of agency EEO action plans to improve EEO program efficiency and/or eliminate identified barriers to the realization of equality of opportunity?		X		
Are sufficient personnel resources allocated to the EEO Program to ensure that agency self-assessments and self-analyses prescribed by EEO MD-715 are conducted annually and to maintain an effective complaint processing system?		X		
Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed?		X		
Federal Women's Program - 5 U.S.C. 7201; 38 U.S.C. 4214; Title 5 CFR, Subpart B, 720.204		X		
Hispanic Employment Program - Title 5 CFR, Subpart B, 720.204		X		
People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter 1-3102; 5 CFR 213.3102(t) and (u); 5 CFR 315.709		X		
Are other agency special emphasis programs monitored by the EEO Office for coordination and compliance with EEO guidelines and principles, such as FEORP - 5 CFR 720; Veterans Employment Programs; and Black/African American; American Indian/Alaska Native, Asian American/Pacific Islander programs?		X		

Compliance Indicator	The agency has committed sufficient budget to support the success of its EEO Programs.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes	No	
Are there sufficient resources to enable the agency to conduct a thorough barrier analysis of its workforce, including the provision of adequate data collection and tracking systems		X		
Is there sufficient budget allocated to all employees to utilize, when desired, all EEO programs, including the complaint processing program and ADR, and to make a request for reasonable accommodation? (Including subordinate level reporting components?)		X		
Has funding been secured for publication and distribution of EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures, etc.)?		X		
Is there a central fund or other mechanism for funding supplies, equipment and services necessary to provide disability accommodations?		X		
Does the agency fund major renovation projects to ensure timely compliance with Uniform Federal Accessibility Standards?		X		
Is the EEO Program allocated sufficient resources to train all employees on EEO Programs, including administrative and judicial remedial procedures available to employees?		X		
Is there sufficient funding to ensure the prominent posting of written materials in all personnel and EEO offices? [see 29 C.F.R. § 1614.102(b)(5)]		X		
Is there sufficient funding to ensure that all employees have access to this training and information?		X		
Is there sufficient funding to provide all managers and supervisors with training and periodic up-dates on their EEO responsibilities:		X		
for ensuring a workplace that is free from all forms of discrimination, including harassment and retaliation?		X		
to provide religious accommodations?		X		
to provide disability accommodations in accordance with the agency's written procedures?		X		
in the EEO discrimination complaint process?		X		
to participate in ADR?		X		

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY				
This element requires the Agency Head to hold all managers, supervisors, and EEO implementation of the agency's EEO Program and		Officials responsible		for the effective
Compliance Indicator	EEO program officials advise and provide appropriate assistance to managers/supervisors about the status of EEO programs within each manager's or supervisor's area or responsibility.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
* Measures		Yes	No	
Are regular (monthly/quarterly/semi-annually) EEO updates provided to management/supervisory officials by EEO program officials?		X		
Do EEO program officials coordinate the development and implementation of EEO Plans with all appropriate agency managers to include Agency Counsel, Human Resource Officials, Finance, and the Chief information Officer?		X		
Compliance Indicator	The Human Resources Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures are in conformity with instructions contained in EEOC management directives. [see 29 CFR § 1614.102(b)(3)]	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
* Measures		Yes	No	
Have time-tables or schedules been established for the agency to review its Merit Promotion Program Policy and Procedures for systemic barriers that may be impeding full participation in promotion opportunities by all groups?		X		Yes, however see H-5
Have time-tables or schedules been established for the agency to review its Employee Recognition Awards Program and Procedures for systemic barriers that may be impeding full participation in the program by all groups?		X		Yes, however see H-5
Have time-tables or schedules been established for the agency to review its Employee Development/Training Programs for systemic barriers that may be impeding full participation in training opportunities by all groups?		X		Yes, however see H-5
Compliance Indicator	When findings of discrimination are made, the agency explores whether or not disciplinary actions should be taken.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
* Measures		Yes	No	
Does the agency have a disciplinary policy and/or a table of penalties that covers employees found to have committed discrimination?		X		
Have all employees, supervisors, and managers been informed as to the penalties for being found to perpetrate discriminatory behavior or for taking personnel actions based upon a prohibited basis?		X		

Has the agency, when appropriate, disciplined or sanctioned managers/supervisors or employees found to have discriminated over the past two years?	X		Please see response below.
<p>If so, cite number found to have discriminated and list penalty /disciplinary action for each type of violation.</p> <p><b>Response:</b> This question is not applicable, since there were no findings of discrimination by the agency in the last two years.</p>			
Does the agency promptly (within the established time frame) comply with EEOC, Merit Systems Protection Board, Federal Labor Relations Authority, labor arbitrators, and District Court orders?	X		
Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?	X		



Essential Element D: PROACTIVE PREVENTION				
Requires that the agency head makes early efforts to prevent discriminatory actions employment opportunity in the workplace.		and eliminate		barriers to equal
Compliance Indicator	Analyses to identify and remove unnecessary barriers to employment are conducted throughout the year.	Measure has been met		For all unmet measures, provide a brief explanation in the space below or complete and attach 01 PART H to the agency's status report
Measures		Yes	No	
	Do senior managers meet with and assist the EEO Director and/or other EEO Program Officials in the identification of barriers that may be impeding the realization of equal employment opportunity?	X		
	When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?		X	Please see form H-1 attached.
	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?		X	Please see form H-1 attached.
	Are trend analyses of workforce profiles conducted by race, national origin, sex and disability?	X		
	Are trend analyses of the workforce's major occupations conducted by race, national origin, sex and disability?	X		
	Are trends analyses of the workforce's grade level distribution conducted by race, national origin, sex and disability?	X		
	Are trend analyses of the workforce's compensation and reward system conducted by race, national origin, sex and disability?	X		
	Are trend analyses of the effects of management/personnel policies, procedures and practices conducted by race, national origin, sex and disability?	X		
Compliance Indicator	The use of Alternative Dispute Resolution (ADR) is encouraged by senior management.	Measure has been		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
* Measures		Yes	No	
	Are all employees encouraged to use ADR?	X		
	Is the participation of supervisors and managers in the ADR process required?	X		Yes, however please see form H-2 attached.

Essential Element E: EFFICIENCY Requires that the agency head ensure that there are effective systems in effectiveness of the agency's EEO Programs as well as an efficient and		place for evaluating fair		the impact and process.
<b>Compliance Indicator</b>	<b>The agency has sufficient staffing, funding, and authority to achieve the elimination of identified</b>	<b>Measure has been met</b>		<b>For all unmet measures, provide a brief explanation in the space</b>
<b>Measures</b>	<b>barriers.</b>	<b>Yes</b>	<b>No</b>	<b>attach an EEOC FORM 715-01 PART H to the agency's status report</b>
Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?			X	Please see form H-3 attached.
Has the agency implemented an adequate data collection and analysis systems that permit tracking of the information required by MD-715 and these instructions?		X		
Have sufficient resources been provided to conduct effective audits of field facilities' efforts to achieve a model EEO program and eliminate discrimination under Title VII and the Rehabilitation Act?		X		
Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations in all major components of the agency?		X		
Are 90% of accommodation requests processed within the time frame set forth in the agency procedures for reasonable accommodation?			X	Please see form H-4 attached.
<b>Compliance Indicator</b>	<b>The agency has an effective complaint tracking and monitoring system in place to increase the effectiveness of the agency's EEO Programs.</b>	<b>Mea sure has bee</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM</b>
<b>* Measures</b>		<b>Yes</b>	<b>No</b>	<b>715-01 PART H to the agency's status report</b>
Does the agency use a complaint tracking and monitoring system that allows identification of the location and status of complaints and length of time elapsed at each stage of the agency's complaint resolution process?		X		
Does the agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials and other information to analyze complaint activity and trends?		X		
Does the agency hold contractors accountable for delay in counseling and investigation processing times?		X		
If yes, briefly describe how: Contact payment is reduced or the contract is not renewed.				
Does the agency monitor and ensure that new investigators, counselors, including contract and collateral duty investigators, receive the 32 hours of training required in accordance with EEO Management Directive MD-110?		X		

Does the agency monitor and ensure that experienced counselors, investigators, including contract and collateral duty investigators, receive the 8 hours of refresher training required on an annual basis in accordance with EEO Management Directive MD-110?		X		
<b>Compliance Indicator</b>	<b>The agency has sufficient staffing, funding and authority to comply with the time frames in accordance with the EEOC (29 C.F.R. Part 1614) regulations for processing EEO complaints of employment discrimination.</b>	<b>Measure has been met</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
<b>Measures</b>		<b>Yes</b>	<b>No</b>	
Are benchmarks in place that compares the agency's discrimination complaint processes with 29 C.F.R. Part 1614?		X		
Does the agency provide timely EEO counseling within 30 days of the initial request or within an agreed upon extension in writing, up to 60 days?		X		
Does the agency provide an aggrieved person with written notification of his/her rights and responsibilities in the EEO process in a timely fashion?		X		
Does the agency complete the investigations within the applicable prescribed time frame?			X	Please see form H-5 attached.
When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?			X	Please see form H-5 attached.
When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?			X	Please see form H-5 attached.
When a settlement agreement is entered into, does the agency timely complete any obligations provided for in such agreements?		X		
Does the agency ensure timely compliance with EEOC AJ decisions which are not the subject of an appeal by the agency?		X		
<b>Compliance Indicator</b>	<b>There is an efficient and fair dispute resolution process and effective systems for evaluating the impact and effectiveness of the agency's EEO complaint processing program.</b>	<b>Measure has been met</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
<b>Measures</b>		<b>Yes</b>	<b>No</b>	
In accordance with 29 C.F.R. §1614.102(b), has the agency established an ADR Program during the pre-complaint and formal complaint stages of the EEO process?		X		
Does the agency require all managers and supervisors to receive ADR training in accordance with EEOC (29 C.F.R. Part 1614) regulations, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR?		X		Yes, however please see form H-2 attached.
After the agency has offered ADR and the complainant has elected to participate in ADR, are the managers required to participate?		X		Yes, however please see form H-2 attached.

Does the responsible management official directly involved in the dispute have settlement authority?		X		
<b>Compliance Indicator</b>	<b>The agency has effective systems in place for maintaining and evaluating the impact and effectiveness of its EEO programs.</b>	<b>Measure has been</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
<b>* Measures</b>		Yes	No	
Does the agency have a system of management controls in place to ensure the timely, accurate, complete and consistent reporting of EEO complaint data to the EEOC?		X		
Does the agency provide reasonable resources for the EEO complaint process to ensure efficient and successful operation in accordance with 29 C.F.R. § 1614.102(a)(1)?		X		
Does the agency EEO office have management controls in place to monitor and ensure that the data received from Human Resources is accurate, timely received, and contains all the required data elements for submitting annual reports to the EEOC?		X		
Do the agency's EEO programs address all of the laws enforced by the EEOC?		X		
Does the agency identify and monitor significant trends in complaint processing to determine whether the agency is meeting its obligations under Title VII and the Rehabilitation Act?		X		
Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?			X	Please see form H-6 attached.
Does the agency consult with other agencies of similar size on the effectiveness of their EEO programs to identify best practices and share ideas?		X		
<b>Compliance Indicator</b>	<b>The agency ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm of agency or other offices with conflicting or competing interests.</b>	<b>Measure has been met</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
<b>■ Measures</b>		Yes	No	
Are legal sufficiency reviews of EEO matters handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints?		X		
Does the agency discrimination complaint process ensure a neutral adjudication function?		X		
If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?			X	Please see form H-5 attached.



This element requires	Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE that federal agencies are in full compliance with EEO statutes and EEOC regulations, policy	COMPLIANCE	statutes and EEOC	regulations, policy
Compliance Indicator	Agency personnel are accountable for timely compliance with orders issued by EEOC Administrative Judges.	Measure has been		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes		
	Does the agency have a system of management control to ensure that agency officials timely comply with any orders or directives issued by EEOC Administrative Judges?	X		
Compliance Indicator	The agency's system of management controls ensures that the agency timely completes all ordered corrective action and submits its compliance report to EEOC within 30 days of such completion.	Measure has been		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes	No	
Does the agency have control over the payroll processing function of the agency? If Yes, answer the two questions below.		X		
Are there steps in place to guarantee responsive, timely, and predictable processing of ordered monetary relief?		X		
Are procedures in place to promptly process other forms of ordered relief?		X		
Compliance Indicator	Agency personnel are accountable for the timely completion of actions required to comply with orders of EEOC.	Measure has been		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
Measures		Yes	No	
Is compliance with EEOC orders encompassed in the performance standards of any agency employees?		X		
If so, please identify the employees by title in the comments section, and state how performance is measured.		Ron Ballard, Assistant Director Employment Complaints Resolutions Division; Compliance is specifically included in performance standards.		
Is the unit charged with the responsibility for compliance with EEOC orders located in the EEO office?		X		
If not, please identify the unit in which it is located, the number of employees in the unit, and their grade levels in the comments section.				
Have the involved employees received any formal training in EEO compliance?		X		

Does the agency promptly provide to the EEOC the following documentation for completing compliance:			
Attorney Fees: Copy of check issued for attorney fees and !or a narrative statement by an appropriate agency official, or agency payment order dating the dollar amount of attorney fees paid?	X		
Awards: A narrative statement by an appropriate agency official stating the dollar amount and the criteria used to calculate the award?	X		
Back Pay and Interest: Computer print-outs or payroll documents outlining gross back pay and interest, copy of any checks issued, narrative statement by an appropriate agency official of total monies paid?	X		
Compensatory Damages: The final agency decision and evidence of payment, if made?	X		
Training: Attendance roster at training session(s) or a narrative statement by an appropriate agency official confirming that specific persons or groups of persons attended training on a date certain?	X		
Personnel Actions (e.g., Reinstatement, Promotion, Hiring, Reassignment): Copies of SF-50s	X		
Posting of Notice of Violation: Original signed and dated notice reflecting the dates that the notice was posted. A copy of the notice will suffice if the original is not available.	X		
Supplemental Investigation: 1. Copy of letter to complainant acknowledging receipt from EEOC of remanded case. 2. Copy of letter to complainant transmitting the Report of Investigation (not the ROI itself unless specified). 3. Copy of request for a hearing (complainant's request or agency's transmittal letter).	X		
Final Agency Decision (FAD): FAD or copy of the complainant's request for a hearing.	X		
Restoration of Leave: Print-out or statement identifying the amount of leave restored, if applicable. If not, an explanation or statement.	X		
Civil Actions: A complete copy of the civil action complaint demonstrating same issues raised as in compliance matter.	X		
Settlement Agreements: Signed and dated agreement with specific dollar amounts, if applicable. Also, appropriate documentation of relief is provided.	X		

<b>FORM 715-01 PART H - 1</b>		<b>U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
U.S. ENVIRONMENTAL PROTECTION AGENCY		FY 2010	
STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	<p>When barriers are identified, do senior managers develop and implement, with the assistance of the agency EEO office, agency EEO Action Plans to eliminate said barriers?</p> <p>Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans?</p>		
OBJECTIVE:	<p>To ensure that senior managers are involved in the process of implementing EEO Action Plans.</p> <p>To ensure that senior managers are aware of EEO Action Plans based on MD 715, incorporate EEO Action Plans into the EPA's strategic plan, and work to accomplish identified action items throughout the course of the year.</p>		
RESPONSIBLE OFFICIAL:	<p>Senior Executives throughout the Agency Director, Office of Civil Rights Director, Office of Human Resources Associate Assistant Administrator for Diversity, Outreach and Collaboration</p>		
DATE OBJECTIVE INITIATED:	February 1, 2011		
TARGET DATE FOR COMPLETION OF OBJECTIVE:	December 30, 2012		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)		
The Office of Civil Rights will present the State of EEO in EPA to senior officials.	March 30, 2011		
The Office of Civil Rights, the Office of Diversity Outreach Collaboration, and Office of Human Resources will work with the Assistant and Regional Administrators to develop EEO action plans based on the current MD-715, (in consultation with Office of General Counsel/Regional Counsel).	July 31, 2011		

<p>Pursuant to instructions from the Office of Civil Rights, the Office of Diversity, Outreach and Collaboration, and Office of Human Resources, each Assistant Administrator/ Regional Administrator organization will submit bi-annual reports reflecting accomplishments or actions taken in support of implementation of action plans.</p>	<p>November 15, 2011</p>
<p>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</p>	

U.S. ENVIRONMENTAL PROTECTION AGENCY

FY 2010

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Is the participation of supervisors and managers in the ADR process required? Does the agency require all managers and supervisors to receive ADR training? After the agency has offered ADR and the complainant elected to participate in ADR, are managers required to participate?
OBJECTIVE:	To provide additional notice to supervisors and/or managers when their participation in the ADR process is required and when they are required to participate in ADR training.
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights Assistant Director, Employment Complaints Resolutions Division
DATE OBJECTIVE INITIATED:	February 1, 2011
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2012
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Review, revise and publish the current ADR policy to all managers and supervisors.	June 30, 2011
Offer EEO training, including a module on ADR, to all managers and supervisors.	September 30, 2011
REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:	

**FORM  
715-01  
PART H-3**

*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL  
EEO PROGRAM STATUS REPORT**

U.S. ENVIRONMENTAL PROTECTION AGENCY

FY 2010

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Does the EEO Office employ personnel with adequate training and experience to conduct the analyses required by MD-715 and these instructions?
OBJECTIVE:	To further improve the training and skills of EEO personnel in the Office of Civil Rights and in the Regions to enable them to administer all aspects of the EEO process.
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights
DATE OBJECTIVE INITIATED:	September 1, 2010
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2012
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The EPA hired outside expert/consultant to review structure, management and staff and to make recommendations concerning EEO Office in order to help EPA establish a model EEO program.	September 1, 2010
Within thirty days of receiving the consultant's recommendations, the agency will develop and implement an action plan, which will include identifying managerial challenges; strengthening employees' skills; and creating adequate oversight measures for timely completion of the MD-715 report and other EEO functions	April 1, 2011



REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:

The Office of Civil Rights has selected a new permanent Director effective in January 2011.

The Office of Civil Rights asked an outside consultant to conduct an analysis of ways to improve the efficiency, quality and effectiveness of the EPA's civil rights program.

The Office of Civil Rights Staff in the Affirmative Employment Division attended EEOC's Advanced MD-715 training.

U.S. ENVIRONMENTAL PROTECTION AGENCY

FY 2010

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Are 90% of accommodation requests processed within the time frame set forth in the agency procedures for reasonable accommodation?
OBJECTIVE:	The agency will improve the current rate of 86% for timely processing of accommodation requests to 90%.
RESPONSIBLE OFFICIAL:	Director, Office of Civil Rights National Reasonable Accommodation Coordinator
DATE OBJECTIVE INITIATED:	October 1, 2010
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2011
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
On a quarterly basis, the National Reasonable Accommodation Coordinator will brief the Director of Civil Rights on the timeliness of processing reasonable accommodation requests, identify the causes of any delay and make recommendations, when possible, regarding how to prevent future delays.	April 31, 2011
The National Reasonable Accommodation Coordinator, in consultation with management and Local Reasonable Accommodation Coordinators, will conduct regular reasonable accommodation trainings that emphasize the importance of timeliness during the process.	June 30, 2011

REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:

The agency is in substantial compliance with the agency's obligation to process 90% of reasonable accommodation requests in a timely fashion.

The EPA reviewed and revised as appropriate its reasonable accommodation procedures in light of the Americans with Disabilities Amendments Act of 2008 and Genetic Information Nondiscrimination Act (GINA).

U.S. ENVIRONMENTAL PROTECTION AGENCY

FY 2010

STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:

Does the agency complete the investigations within the applicable prescribed time frame?

When a complainant requests a final agency decision, does the agency issue the decision within 60 days of the request?

When a complainant requests a hearing, does the agency immediately upon receipt of the request from the EEOC AJ forward the investigative file to the EEOC Hearing Office?

If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints?

The Equal Employment Opportunity Commission (EEOC) requested that the EPA address the issue of untimely submission of Management Directive 715 (MD-715) reports to the EEOC.

OBJECTIVE:

To ensure that EEO investigations consistently are completed on time in accordance with EEOC MD 110 and 29 CFR 1614.

To ensure that final agency decisions consistently are completed on time in accordance with EEOC MD 110 and 29 CFR 1614.

To ensure that the agency consistently forwards the investigative file to the EEOC Hearing Office immediately upon receipt of requests from an EEOC Administrative Judge in accordance with EEOC MD 110 and 29 CFR 1614.

To ensure that the Office of Civil Rights consistently establishes and meets timeframes such that there is sufficient time for counsel to conduct legal sufficiency reviews within the regulatory timeframes.

To submit timely reports in compliance with MD-715 to the EEOC.

RESPONSIBLE OFFICIAL:

Director, Office of Civil Rights  
Assistant Director, Employment Complaints Resolutions Division  
Deputy Regional Administrators

DATE OBJECTIVE  
INITIATED:

March 1, 2011

TARGET DATE FOR  
COMPLETION OF  
OBJECTIVE:

September 30, 2011

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The agency will develop effective performance terms with its contract investigators to ensure timely completion of investigations.	February 28, 2011
The Office of Civil Rights will develop and implement a plan consistent with federal procurement policies to terminate contracts for failure to comply with established timeframes.	February 28, 2011
To ensure timely submission of MD 715 reports, the agency will establish a project management system including development of milestones, quarterly reporting and review of contractor performance.	March 1, 2011
The Office of Civil Rights will enhance EEO Officer and counselor training on meeting deadlines.	March 31, 2011
The Office of Civil Rights will develop and implement a new complaint status report tracking system, which tracks all complaint-related events and will share the reports within the EEO community.	April 30, 2011
The Director of Civil Rights and the Assistant Director, Employment Complaints Resolutions Division will evaluate these new practices.	September 30, 2011
<p>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</p> <p>Management established the filing of a timely and thorough MD 715 report as the highest priority, by initiating an interim reporting requirement and the analysis of data as it becomes available. In April and October 2010, OCR staff members attended advanced MD 715 training.</p>	

**FORM  
715-01  
PART H-6**

*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL  
EEO PROGRAM STATUS REPORT**

U.S. ENVIRONMENTAL PROTECTION AGENCY

FY 2010

STATEMENT of MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY:	Does the agency track recruitment efforts and analyze efforts to identify potential barriers in accordance with MD-715 standards?
OBJECTIVE:	Create a tracking system for the agency's recruitment efforts and attempt to link it to the Office of Management and Budget's (OMB's) standard form 3046-0046.
RESPONSIBLE OFFICIALS:	Assistant Administrator, Office of Administration and Resources Management Associate Assistant Administrator, Office of Diversity Outreach and Collaboration Director, Office of Human Resources Director, Office of Civil Rights
DATE OBJECTIVE INITIATED:	February 1, 2011
TARGET DATE FOR COMPLETION OF OBJECTIVE:	September 30, 2012
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
The Office of Civil Rights and the Office of Administration and Resources Management will identify and agree on the parameters of a system that will effectively track recruitment efforts.	March 1, 2011
The Office of Administration and Resources Management will determine whether the current recruitment tracking system is adequate.	April 1, 2011
The Office of Administration and Resources Management will implement the new tracking system.	June 30, 2011



<p>The Office of Administration and Resources Management and the Office of Civil Rights will evaluate the effectiveness of the system and develop a plan for addressing any problems revealed by the evaluation.</p>	<p>September 30, 2011</p>
<p>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</p> <p>The Directors and staff in the Office of Civil Rights and the Office of Human Resources discussed the issue of applicant flow data and were able to acquire applicant flow data for new hires and competitive internal promotions. The offices will continue to work collaboratively in order to obtain applicant flow data for more occupations, including senior executives.</p> <p>The Office of Civil Rights and the Office of Human Resources met several times over the course of the year and are collaborating on developing a plan to better manage and integrate HR and EEO data systems, (see Part H form on pg. 23 of 2009 report). In addition, the Affirmative Employment Division of the Office of Civil Rights (AED) reviewed and distributed workforce statistical data on a quarterly basis, (see Part H form on page (pg.) 23 of 2009 report).</p>	

<b>EEOC FORM 715-01 PART I-1</b>	<b><i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>Hispanic Female Hires</b>	<b>FY 2010</b>
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>A review of the total workforce distribution by race in Fiscal Year (FY) 2010 revealed that Hispanic Females (HF) were represented in the EPA at a rate of 2.96% while the representation of Hispanic Females in the civilian labor force (CLF) is 4.50%.</p>	
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency reviewed the statistical data associated with new hires (Table A7) for the agency's major occupations.</p> <p>The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below. The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation<sup>1</sup> rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <ol style="list-style-type: none"> <li>1. Environmental Protection Specialist (Series 0028): HF applied for entry level positions at a rate of 2.98%; this rate exceeds the 0.90% representation rate of HF in the relevant civilian labor force (RCLF). HF's representation in the pool of candidates found qualified for the position is 3.27%, which is slightly higher than their representation in the applicant pool. However, their selection rate of 2.17% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should conduct a further examination of the selection process, including the interview practices, to identify what is causing the selection rate to be lower than the qualification rate.</li> <li>2. Misc. Administration and Program Specialist (Series 0301): HF applied for entry level positions at a rate of 5.05%; this rate is lower than the 5.30% representation rate of HF in the RCLF. HF's representation in the pool of candidates found qualified for the position is 5.07%, which is higher than their representation in the applicant pool. Similarly, the selection rate of HF is 11.11%, which is higher than expected based on their representation rates in the</li> </ol>	

	<p>qualified pool. Such a result suggests that there is no barrier for Hispanic Female hires in this series.</p> <ol style="list-style-type: none"> <li>3. Management/Program Analyst (Series 0343): HF applied for entry level positions at a rate of 2.79%; this rate exceeds the 1.60% representation rate of HF in the RCLF. HF's representation in the pool of candidates found qualified for the position is 3.04%, which is higher than their rate of representation in the applicant pool. In addition, they are being selection at a rate of 6.25%, which is higher than their representation rates in the qualified pool. Such a result suggests that there is no barrier for Hispanic Female hires in this series.</li> <li>4. General Biological Science (RESEARCH) (Series 401): HF applied for entry level positions at a rate of 3.35%; this rate exceeds the 2.10% representation rate of HF in the RCLF. HF's representation in the pool of candidates found qualified for the position is 3.56%, which is higher than their representation in the applicant pool. However, they are being selected at a rate of 2.56% which is lower than their representation both in the qualified pool. Such a result suggests that the agency should conduct a further examination of the selection practices, including the interview process, to identify what is causing the selection rate to be lower than the qualification rate.</li> <li>5. Environmental Engineer (RESEARCH) (Series 819): HF applied for entry level positions at a rate of 3.69%; this rate exceeds the 0.90% representation rate of HF in the RCLF. HF's representation in the pool of candidates found qualified for the position is 3.81%, which is higher than their representation in the applicant pool. However, they are being selected at a rate of 3.08%, which is lower than their representation in the qualified pool. Such a result suggests that the agency should conduct a further examination of the selection process, including the interview practices, to identify what is causing the selection rate to be lower than the qualification rate.</li> <li>6. Physical Scientist/Environmental Scientist (Series 1301): HF applied for entry level positions at a rate of 3.39% this rate exceeds the 1.70% representation rate of HF in the RCLF HF's representation in the pool of candidates found qualified for the position is 3.65%, which is higher than their representation in the applicant pool. However, they are being selected at a rate of 0.00%, which is lower than their representation both in the qualified pool. Such a result suggests that the agency should conduct a further examination of the selection process, including the interview practices, to identify what is causing the selection rate to be lower than the qualification rate.</li> </ol> <p>Based on this demographic snapshot and analysis, it appears that EPA generally has been successful in recruiting Hispanic Females for its major occupations, because the representation of Hispanic Females in the applicant pool for new hires in EPA's major occupations exceeds their representation in the RCLF. [It is noted that the Misc Administrative and Program Specialist occupation, series 0301, is an exception to this conclusion, because there is a difference between the application rate and</p>
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	<p>the representation in the RCLF. However, it appears that the difference does not seem to be notable. Notwithstanding this apparent success, the EPA will continue to monitor the impact of its recruitment efforts.</p> <p>The data related to the qualified rate and selection rate is useful and provides Office of Civil Rights staff with more direction regarding what parts of the selection process require closer examination in order to allow the agency to identify, what, if any, policy, practice or procedure may be a barrier to equal employment opportunity. For example, one issue requiring further examination is when the selection rate appears to be lower than the qualification rate, (e.g., occupational series 0028, 0401, 0819 and 1301), the agency will review the selection process, including interview practices, associated with these occupational series.</p> <p>It is noted that in previous reports, the EPA included attorneys (series 0905) in the category of major occupations, and that information is reflected on the attached tables. EPA will continue to gather and refine the applicant flow data associated with this series in an effort to analyze it in future reports.</p> <p>Moreover, in future reports the agency will examine all mission critical occupations, (including occupational series 0028, 0401, 0819 and 1301), to determine whether there are any other triggers for Hispanic Females with respect to the new hire selection process.</p> <p>Prior to conducting a statistical analysis based on the hiring rate for major occupations, the agency conducted a focus group/brown bag/listening session with employees regarding Hispanics in the workforce to identify perceptions about opportunities within the agency. Some of the employees attending this session shared their perceptions that managers are reluctant to entrust an employee who was hired through a diversity student program or diversity job fair with important responsibilities and tasks thereby limiting these employees' opportunities for advancement. EPA's plans for addressing this perception are identified in this report under the PART I form addressing internal competitive promotions.</p> <p>In addition, because this listening session was conducted prior to an in-depth analysis of applicant flow data for new hires, it may be necessary to conduct additional climate surveys tailored to those parts of the selections process requiring additional examination.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible to identify the selection process policy, practice or procedure which may be causing a lower than expected selection rate for Hispanic Females. Based on the preliminary analysis of the data, the civil rights office will continue its analysis of the selection process, including interview practices, associated with occupational series 0028, 0401, 0819 and 1301.</p>
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy,</p>	<p>Using the applicant flow data associated with new hires for the agency's major occupations, the agency will continue to evaluate the selection process, including interview practices, associated with occupational series 0028, 0401, 0819 and 1301 in an attempt to identify the policy, practice or</p>

procedure or practice to be implemented to correct the undesired condition.	procedure which may be causing a lower than expected selection rate for Hispanic Females.
<b>RESPONSIBLE OFFICIAL:</b>	Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights
<b>DATE OBJECTIVE INITIATED:</b>	February 15, 2011
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2013

<b>EEOC FORM 715-01 Barrier PART I-1</b>	<b>EEO Plan To Eliminate Identified</b>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, the Minority Academic Institutions Coordinator in the Office of Small Business Programs, staff in the Office of Outreach, Diversity, and Collaboration and the Special Emphasis Program Managers in the Office of Civil Rights will develop and use a current list of recruitment partners, including academic institutions and professional associations, to allow for a broader dissemination of the agency's employment opportunities, including professional and educational institutions affiliated with the Hispanic community.</p>	<p>February 28, 2011</p>
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Human Resources, and Director of Office of Civil Rights will identify the policy, practice or procedure that may have caused Hispanic Females to appear to be hired at a rate lower than their representation rate in the applicant pool, (e.g., occupational series 0028, 0401, 0819, 1301), and will examine the participation rates of Hispanic females in other mission critical occupations.</p> <p>The agency's plan includes the following actions:</p> <ol style="list-style-type: none"> <li>1. Identification of HR staffing specialist with expertise regarding the external hiring process.</li> <li>2. Identification of a sample of managers who have made new hire selections for the relevant occupations.</li> <li>3. Interviews of the HR staffing specialist and Managers about the policies, practices and procedures used.</li> <li>4. Obtaining data associated with the use of each policy, practice or procedure associated with the external hiring process.</li> <li>5. Conducting a statistical analysis regarding the use of the relevant policy, practice or procedure.</li> <li>6. Evaluating whether alternative policy, practice or procedure achieve the same business objective and is legally permissible to implement.</li> </ol>	<ol style="list-style-type: none"> <li>1. February 28, 2011</li> <li>2. March 30, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> <li>5. January 30, 2012</li> <li>6. September 30, 2013</li> </ol>
<p>The National Hispanic Employment Program Manager will develop a plan for assessing whether there are attitudinal barriers to employment opportunities including conducting focus groups with employees and managers, as well as continuing to hold routine Hispanic Employment Program Manager meetings.</p>	<p>June 30, 2011</p>



## **REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. The continued cooperation between the OCR and OHR also should allow the agency to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The National Hispanic Employment Program Manager held brown bag/listening sessions with employees from each of the organizations in EPA's Headquarters building to discuss their perceptions regarding the hiring process within the EPA. In addition, several of EPA's regional Hispanic Employment Program Managers also conducted regular meetings and brown bag sessions with employees.

The Agency's Office of Small Business Programs oversees the agency's Minority Academic Institutions Program. In FY 2010, Administrator Jackson signed a Memorandum of Understanding between EPA and the Hispanic Association of Colleges and Universities, which complemented the EPA Memorandum of Understanding with the League of United Latin American Citizens that was extended in FY 2009. In addition to these initiatives, EPA regions continue to partner with Hispanic Serving Institutions, college and student Hispanic and Latino advocacy groups at colleges and universities across the country, and Hispanic and Latino advocacy organizations and professional organizations in an effort to expand the applicant pools. The EPA also continues to attend community events, job fairs and similar activities to promote employment opportunities within the agency.

The National Hispanic Employment Program Manager developed and presented an outline of the key components of the Hispanic Employment Program at the annual developmental training in July 2010. As a result of the training, several regions have increased their outreach and recruitment efforts. In addition, the Administrator signed a new Memorandum of Understanding agreement with the Hispanic Association of Colleges and Universities.

Twelve EPA senior managers attended the Latino Educational Science Technology Engineering and Mathematics (STEM) Conference on April 1, 2010. The event brought STEM experts and leaders from the federal government and private sector to find ways to involve more Latino students in the STEM fields.

The EPA Administrator participated in a roundtable discussion with over 25 national Hispanic organizations.

EEOC FORM 715-01 PART 1-2	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
ENVIRONMENTAL PROTECTION AGENCY	<div>Hispanic Female Promotions</div> <div>FY 2010</div>
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>A review of the total workforce distribution by race for Fiscal Year (FY) 2010 revealed that Hispanic Females (HF) were represented in the EPA at a rate of 2.96% while the representation of Hispanic Females in the civilian labor force (CLF) is 4.50%.</p>
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency reviewed the statistical data associated with internal competitive promotions for major occupations (Table A9) and the participation rates by major occupations (Table A6). The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below.</p> <p>The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <ol style="list-style-type: none"> <li>1. Environmental Protection Specialist (Series 0028): HF applied for promotions at a rate of 3.49%; this rate exceeds the 3.02% participation rate of HF in the occupation series. HF were found qualified for positions at a rate of 3.62%, which is higher than their rate of representation in the applicant pool. However, their selection rate of 0.00% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the selection process, including the interview practices, to identify what is causing the selection rate to be lower than the qualification rate.</li> <li>2. Misc. Administration and Program Specialist (Series 0301): HF applied for promotions at a rate of 6.30%; this rate exceeds the 3.98% participation rate of HF in the occupational series. HF were found qualified for the position at a rate of 7.14%, which is higher than their rate of representation in the applicant pool. Their selection rate of 20.00% is higher than expected based on their</li> </ol>

	<p>representation rate in the qualified pool, so there does not appear to be any barrier for HF in this series. Such a result suggests that there is no barrier to HF promotions in this occupational series.</p> <ol style="list-style-type: none"> <li>3. Management/Program Analyst (Series 0343): HF applied for promotions at a rate of 4.07%; this rate exceeds the 2.63% participation rate of HF in the occupational series. HF were found qualified for the position at a rate of 6.35%, which is higher than their rate of representation in the applicant pool. Their selection rate of 3.33% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the selection process, including the interview process, to identify what is causing the selection rate to be lower than the qualification rate.</li> <li>4. General Biological Science (RESEARCH) (Series 401): HF applied for promotions at a rate of 3.81%; this rate exceeds the 2.81 % participation rate of HF in the occupational series. HF were found qualified for the position at a rate of 6.06%, which is higher than their rate of representation in the applicant pool. Their selection rate of 5.00% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the selection process, including the interview practices, to identify what is causing the selection rates to be lower than expected.</li> <li>5. Environmental Engineer (RESEARCH) (Series 819): HF applied for promotions at a rate of 6.25%; this rate exceeds the 3.27% participation rate of HF in the occupational series. HF were found qualified for the position at a rate of 2.27%, which is lower than their rate of representation in the applicant pool. Their selection rate of 0.00% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the recruitment and selection process, including the qualification criteria and interview practices, to identify what is causing the application and selection rates to be lower than expected.</li> <li>6. Physical Scientist/Environmental Scientist (Series 1301): HF applied for promotions at a rate of 6.94%; this rate exceeds the 2.52% participation rate of HF in the occupational series. HF were found qualified for the position at a rate of 3.39%, which is lower than their rate of representation in the applicant pool. Their selection rate of 0.00% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the selection process, including the interview process, to identify what is causing the selection rate to be lower than the qualification rate.</li> </ol> <p>Based on this demographic snapshot and analysis, it appears that EPA generally has been successful in recruiting Hispanic Females for its major occupations, because the representation of Hispanic Females in the applicant pool for internal promotions in EPA's major occupations generally exceeds their participation rates in these occupations. Notwithstanding this apparent success, the EPA will continue to monitor the impact of its</p>
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	<p>recruitment efforts with regard to internal competitive promotions.</p> <p>The data related to the qualified rate and selection rate is useful and provides the Office of Civil Rights staff with more direction regarding what parts of the selection process require closer examination in order to allow the agency to identify any policy, practice or procedure that may be a barrier to equal employment opportunity.</p> <p>For example, one issue requiring further examination is when the selection rate appears to be lower than the qualification rate, (e.g., occupational series 0028, 0401, 0819, and 1301), the agency will review the selection process, including interview practices, associated with these occupational series.</p> <p>It is noted that in previous reports, the EPA included attorneys (series 0905) in the category of major occupations and that information is reflected on the attached tables. However, data regarding internal competitive promotion was not available. As a result, EPA is unable to analyze applicant flow data at this time but will plan on gathering such information for future reports if attorneys continue to be a mission critical occupation.</p> <p>Moreover, in future reports, the agency will examine all mission critical occupations, (including occupational series 0028, 0401, 0819 and 1301), to determine whether there are any other triggers for Hispanic Females with respect to the internal competitive promotion process. Unfortunately, the agency experienced technical challenges associated with gathering such data in sufficient time for analysis and discussion in this report, but will shift its focus from major occupations to mission critical occupations in the next report.</p> <p>Prior to conducting a statistical analysis based on the promotion rate for major occupations, the agency conducted a focus group with EPA employees regarding Hispanics to identify perceptions about opportunities within the agency. Some of the employees attending this session shared their perceptions that managers are reluctant to entrust an employee who was hired through a diversity student program or diversity job fair with important responsibilities and tasks, thereby limiting these employees' opportunities for advancement.</p> <p>In addition, because this listening session was conducted prior to an in-depth analysis of promotions, it may be necessary to conduct additional climate surveys tailored to those parts of the selections process requiring additional examination.</p> <p>Until the agency acquires a data collection system capable of capturing the applicant flow data related to competitive developmental opportunities, there is not a means of evaluating the accuracy of this perception. In the meantime, the agency plans to market and hold more training sessions designed to afford all employees with the ability to improve their skills as a means of making themselves more competitive for advancement opportunities.</p>
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<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible to identify the promotion process policy, practice or procedure (including the qualifications standards and interviews), associated with occupational series 0028, 0343, 0401, 0819 and 1301 for Hispanic Females. Based on the preliminary analysis of the data, the civil rights office will continue its analysis of promotions for Hispanic Females. Similarly, without a data collection system capable of collecting data associated with developmental opportunities by race, sex and national origin, it is not possible for the agency to analyze whether there are any barriers.</p>
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Using the applicant flow data associated with promotions for the agency's mission critical occupations, the agency will continue to evaluate the promotion process, including the application of selection criteria, in an attempt to identify the policy, practice or procedure which may be causing a lower than expected participation rate for Hispanic Females in occupational series 0028, 0343, 0401, 0819 and 1301. Additionally, the agency will develop a plan to identify developmental opportunities and to capture the applicant flow data associated with developmental opportunities.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>November 30, 2010</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>September 30, 2013</p>

<b>EEOC FORM 715-01 Barrier PART 1-2</b>	<b>EEO Plan To Eliminate Identified</b>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Human Resources, and Director of Office of Civil Rights will identify the policy, practice or procedure that may have caused Hispanic Females to appear to be selected for internal competitive promotions at a rate lower than their representation rate in the applicant pool, (e.g., occupational series 0401, 0819 and 1301), lower than their representation rate in the pool of candidates found qualified for the internal competitive promotions, (e.g., series 0028, 0343, 0401, 0819 and 1301) and will examine the participation rates of Hispanic females in other mission critical occupations. The agency's plan includes the following actions:</p> <ol style="list-style-type: none"> <li>1. Identification of HR staffing specialist with expertise regarding the internal competitive promotion process.</li> <li>2. Identification of a sample of managers who have made internal competitive promotions for the relevant occupations.</li> <li>3. Interviews of the HR staffing specialist and Managers about the policies, practices and procedures used.</li> <li>4. Obtaining data associated with the use of each policy, practice or procedure associated with the selection process for internal competitive promotions.</li> <li>5. Conducting a statistical analysis regarding the use of the relevant policy, practice or procedure.</li> <li>6. Evaluating whether alternative policy, practice or procedure achieve the same business objective and is legally permissible to implement.</li> </ol>	<ol style="list-style-type: none"> <li>1. February 28, 2011</li> <li>2. March 30, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> <li>5. January 30, 2012</li> <li>6. September 30, 2013</li> </ol>
<p>The National Hispanic Employment Program Manager will develop and implement a plan for assessing whether there are attitudinal barriers to advancement opportunities, including competitive internal promotions, assignments and training.</p>	<p>June 30, 2011</p>
<p>Directors of Human Resource, Executive Resources Division and Civil Rights will develop a plan to identify all developmental opportunities for which applicant flow data may be available, (e.g., temporary competitive details and leadership training or programs) and to make applicant flow data related to such developmental opportunities readily available to allow the agency to conduct a barrier analysis.</p>	<p>October 30, 2011</p>
<p>Directors of Human Resources and Civil Rights will explore the feasibility of developing a national mentor program and develop a plan for creating a mentor initiative designed to facilitate employees' abilities to create mentor relationships.</p>	<p>January 20, 2012</p>
<p>Implement the plan and begin capturing applicant flow data collection for developmental opportunities.</p>	<p>October 30, 2012</p>

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The National Hispanic Employment Program Manager will analyze applicant flow data for developmental opportunities to determine whether there are any barriers to equal employment opportunity.

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October 30, 2012



## REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. The continued cooperation between the OCR and OHR also should allow the agency to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The National Hispanic Employment Program Manager held brown bag/listening sessions with employees from each of the organizations in EPA's Headquarters building to discuss their perceptions regarding the hiring process within the EPA. In addition, several of EPA's regional Hispanic Employment Program Managers also conducted regular meetings and brown bag sessions with employees.

The Agency's Office of Small Business Programs oversees the agency's Minority Academic Institutions Program. In FY 2010, Administrator Jackson signed a Memorandum of Understanding between EPA and the Hispanic Association of Colleges and Universities, which complemented the EPA Memorandum of Understanding with the League of United Latin American Citizens that was extended in FY 2009. In addition to these initiatives, EPA regions continue to partner with Hispanic Serving Institutions, college and student Hispanic and Latino advocacy groups at colleges and universities across the country, and Hispanic and Latino advocacy organizations and professional organizations in an effort to expand the applicant pools. The EPA also continues to attend community events, job fairs and similar activities to promote employment opportunities within the agency.

The National Hispanic Employment Program Manager developed and presented an outline of the key components of the Hispanic Employment Program at the annual developmental training in July 2010. As a result of the training, several regions have increased their outreach and recruitment efforts. In addition, the Administrator signed a new Memorandum of Understanding agreement with the Hispanic Association of Colleges and Universities.

Twelve EPA senior managers attended the Latino Educational Science Technology Engineering and Mathematics (STEM) Conference on April 1, 2010. The event brought STEM experts and leaders from the federal government and private sector to find ways to involve more Latino students in the STEM fields.

The EPA Administrator participated in a roundtable discussion with over 25 national Hispanic organizations.

<b>EEOC FORM 715-01 PART 1-3</b>	<b><i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>Hispanic Male Hires</b>	<b>FY 2010</b>
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>A review of the total workforce distribution by race in Fiscal Year (FY) 2010 revealed that Hispanic Males (HM) were represented in the EPA at a rate of 2.50% while the representation of Hispanic Males in the civilian labor force (CLF) is 6.20%.</p>	
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency reviewed the statistical data associated with new hires (Table A7) for the agency's major occupations.</p> <p>The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below. The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <ol style="list-style-type: none"> <li>1. Environmental Protection Specialist (Series 0028): HM applied for entry level positions at a rate of 3.70%; this rate exceeds the 1.80% representation rate of HM in the relevant civilian labor force (RCLF) for the occupation. HM's representation in the pool of candidates found qualified for the position is 3.71 %, which is slightly higher than their representation in the applicant pool. However, their selection rate of 0.00% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should conduct a further examination of the selection practices, including the interview practices, to identify what is causing the selection rate to be lower than the qualification rate.</li> <li>2. Misc. Administration and Program Specialist (Series 0301): HM applied for entry level positions at a rate of 3.12%; this rate is less than the 4.70% representation rate of HM in the RCLF for the occupation. HM's representation in the pool of candidates found</li> </ol>	

	<p>qualified for the position is 2.95%, which is lower than their representation in the applicant pool. Similarly, the selection rate of HM is 0.00%, which is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should conduct a further examination of the recruitment and selection process, including the selection criteria and the interview practices, to identify what is causing the selection rate to be lower than the qualification rate and the application rate to be lower than the representation in the RCLF.</p> <p>3. Management/Program Analyst (Series 0343): HM applied for entry level positions at a rate of 2.68%; this rate exceeds the 2.00% representation rate of HM in the RCLF for the occupation. HM's representation in the pool of candidates found qualified for the position is 2.43%, which is lower than their rate of representation in the applicant pool. In addition, they are being selection at a rate of 0.00% which is lower than their representation rate in the qualified pool. Such a result suggests that the agency should conduct a further examination of the selection practices, including the interview practices, to identify what is causing the selection rate to be lower than the qualification rate. There is not a notable difference between the application rate and the qualification rate. As a result, the agency will continue to monitor this issue, but will not develop a plan to address the issue at this time.</p> <p>4. General Biological Science (RESEARCH) (Series 401): HM applied for entry level positions at a rate of is 4.53%; this rate exceeds the 1.9% representation rate of HM in the RCLF for the occupation. HM's representation in the pool of candidates found qualified for the position is 3.87%, which is lower than their representation in the applicant pool. However, they are being selected at a rate of 10.26%, which exceeds their representation in the qualified pool. Because the selection rate exceeds the representation rate for HM, the agency will not initiate any actions regarding this series, but will monitor this issue in light of the rate of qualification being lower than the rate of selection.</p> <p>5. Environmental Engineer (RESEARCH) (Series 819): HM applied for entry level positions at a rate of 5.07%; this rate exceeds the 2.20% representation rate of HM in the RCLF for the occupation. HM's representation in the pool of candidates found qualified for the position is 4.47%, which is lower than their representation in the applicant pool. However, they are being selected at a rate of 1.54%, which is lower than their representation in the qualified pool. Such a result suggests that the agency should conduct a further examination of the selection practices, including the interview practices, to identify what is causing the selection rate to be lower than the qualification rate.</p> <p>6. Physical Scientist/Environmental Scientist (Series 1301): HM applied for entry level positions at a rate of 4.56%; this rate exceeds the 2.20% representation rate of HM in the RCLF for the occupation. HM's representation in the pool of candidates found qualified for the position is 4.87%, which is higher than their representation in the applicant pool. Similarly, they are being</p>
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	<p>selected at a rate of 9.52%, which is higher than their representation both in the applicant pool and the RCLF. Therefore, there is no apparent barrier to HM's participation in the 1301 series.</p> <p>Based on this demographic snapshot and analysis, it appears that EPA generally has been successful in recruiting Hispanic Males for its major occupations, because the representation of Hispanic Males in the applicant pool for new hires in EPA's major occupations exceeds their representation in the RCLF for the occupation, with the exception of occupational series 0301. Notwithstanding this apparent success, the EPA will continue to monitor the impact of its recruitment efforts.</p> <p>It is noted that the Misc Administrative and Program Specialist position, occupational series 0301, is an exception to this conclusion regarding the agency's recruitment efforts, because there was not a notable difference between the application rate and the representation of HM in the RCLF. Although the deviation rate may not be statistically significant the Agency will develop a plan to expand its outreach efforts with respect to this occupational series.</p> <p>The data related to the qualified rate and selection rate also is useful and provides more direction regarding what parts of the selection process require closer examination in order to allow the agency to identify what, if any, policy, practice or procedure may be a barrier to equal employment opportunity. For example, one issue requiring further examination is when the application rate appears to be lower than the participation rate for the occupation in the RCLF, e.g., occupational series 0301; in such cases, the agency will review the recruitment process for this occupational series. Other issues requiring further examinations include when the qualification rate is lower than the application rate, (e.g. occupational series 0301, 0401, and 0819) or when the selection rate appears to be lower than the qualification rate, (e.g., occupational series 0028, 0301, 0343 and 0819); and again the agency will review the selection process, including selection criteria and interview practices, associated with these occupational series.</p> <p>It is noted that in previous reports, the EPA included attorneys (series 0905) in the category of major occupations and that information is reflected on the attached tables. EPA will continue to gather and refine the applicant flow data associated with this series in an effort to analyze it in future reports.</p> <p>Moreover, in future reports the agency will examine all mission critical occupations, (including occupational series 0028, 0401, 0819 and 1301), to determine whether there are any other triggers for Hispanic Males with respect to the new hire selection process.</p> <p>Prior to conducting a statistical analysis based on the hiring rate for major occupations, the agency conducted a focus group/brown bag/listening session with employees regarding Hispanics in the workforce to identify perceptions about opportunities within the agency. Some of the employees attending this session shared their perceptions that managers are reluctant to entrust an employee who was hired through a diversity student program or diversity job fair with important responsibilities and tasks, thereby limiting these employees' opportunities for advancement. EPA's plans for addressing this perception are identified in this report under the PART I form addressing internal competitive promotions.</p>
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	It may be necessary to conduct additional climate surveys tailored to those parts of the selections process requiring additional examination.
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	At this time, it is not possible to identify the new hire selection process policy, practice or procedure (including the qualifications standards and interviews), which may be causing a lower than expected qualification or selection rate for HM with regard to occupational series 0028, 0301, 0343, 0401 and 0819.
<b>OBJECTIVE:</b>  State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	Using the applicant flow data associated with new hires for the agency's major occupations, (e.g. 0028, 0301, 0343, 0401 and 0819), the agency will continue to evaluate the selection process, including qualification standards and interviews, in an attempt to identify the new hire selection process policy, practice or procedure which may be causing a lower than expectation selection rate for Hispanic Males in these occupations.
<b>RESPONSIBLE OFFICIAL:</b>	Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights
<b>DATE OBJECTIVE INITIATED:</b>	February 15, 2011
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2013

**EEOC FORM**

**715-01  
PART 1-3**

**EEO Plan To Eliminate Identified Barrier**

<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
The Associate Assistant Administrator for Diversity, Outreach and Collaboration, the Minority Academic Institutions Coordinator in the Office of Small Business Programs, staff in the Office of Outreach, Diversity, and Collaboration and the Special Emphasis Program Managers in the Office of Civil Rights will develop and use a current list of recruitment partners, including academic institutions and professional associations, to allow for a broader dissemination of the agency's employment opportunities, including professional and educational institutions affiliated with the Hispanic community.	February 28, 2011
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Human Resources, and Director of Office of Civil Rights will identify the policy, practice or procedure that may have caused Hispanic males to appear to be selected for internal competitive promotions at a rate lower than their application rate, (e.g., occupational series 0301, 0401 and 0819), lower than their representation rate in the pool of candidates found qualified for the internal competitive promotions, (e.g., series 0028, 0301, 0343 and 0819), and will examine the participation rates of Hispanic males in other mission critical occupations. The agency's plan includes the following actions:</p> <ol style="list-style-type: none"> <li>1. Identification of HR staffing specialist with expertise regarding the external hiring process.</li> <li>2. Identification of a sample of managers who have made new hire selections for the relevant occupations.</li> <li>3. Interviews of the HR staffing specialist and Managers about the policies, practices and procedures used.</li> <li>4. Obtaining data associated with the use of each policy, practice or procedure associated with the external hiring process.</li> <li>5. Conducting a statistical analysis regarding the use of the relevant policy, practice or procedure.</li> <li>6. Evaluating whether alternative policy, practice or procedure achieve the same business objective and is legally permissible to implement.</li> </ol>	<ol style="list-style-type: none"> <li>1. February 28, 2011</li> <li>2. March 30, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> <li>5. January 30, 2012</li> <li>6. September 30, 2013</li> </ol>
The National Hispanic Employment Program Manager will develop and implement a plan for assessing whether there are attitudinal barriers to advancement opportunities, including assignments and training.	June 30, 2011

## **REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. The continued cooperation between the OCR and OHR also should allow the agency to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The National Hispanic Employment Program Manager held brown bag/listening sessions with employees from each of the organizations in EPA's Headquarters building to discuss their perceptions regarding the hiring process within the EPA. In addition, several of EPA's regional Hispanic Employment Program Managers also conducted regular meetings and brown bag sessions with employees.

The Agency's Office of Small Business Programs oversees the agency's Minority Academic Institutions Program. In FY 2010, Administrator Jackson signed a Memorandum of Understanding between EPA and the Hispanic Association of Colleges and Universities, which complemented the EPA Memorandum of Understanding with the League of United Latin American Citizens that was extended in FY 2009. In addition to these initiatives, EPA regions continue to partner with Hispanic Serving Institutions, college and student Hispanic and Latino advocacy groups at colleges and universities across the country, and Hispanic and Latino advocacy organizations and professional organizations in an effort to expand the applicant pools. The EPA also continues to attend community events, job fairs and similar activities to promote employment opportunities within the agency.

The National Hispanic Employment Program Manager developed and presented an outline of the key components of the Hispanic Employment Program at the annual developmental training in July 2010. As a result of the training, several regions have increased their outreach and recruitment efforts. In addition, the Administrator signed a new Memorandum of Understanding agreement with the Hispanic Association of Colleges and Universities.

Twelve EPA senior managers attended the Latino Educational Science Technology Engineering and Mathematics (STEM) Conference on April 1, 2010. The event brought STEM experts and leaders from the federal government and private sector to find ways to involve more Latino students in the STEM fields.

The EPA Administrator participated in a roundtable discussion with over 25 national Hispanic organizations.

ENVIRONMENTAL PROTECTION AGENCY	<b>Hispanic Male Promotions</b> <span style="float: right;"><u>FY 2010</u></span>
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>A review of the total workforce distribution by race for Fiscal Year (FY) 2010 revealed that Hispanic Males (HM) were represented in the EPA at a rate of 2.50% while the representation of Hispanic Males in the civilian labor force (CLF) is 6.20%.</p>
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency reviewed the statistical data associated with internal competitive promotions for major occupations (Table A9) and with participation rates for major occupations (Table A6). The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below.</p> <p>The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <p>1. Environmental Protection Specialist (Series 0028): HM applied for promotions at a rate of 4.07%; this rate exceeds the 1.90% participation rate of HM in the occupational series. HM were found qualified for positions at a rate of 3.99%, which is slightly lower than their representation rate in the applicant pool. However, their selection rate of 2.50% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the selection process, including the interview practices, to identify what is causing the selection rate to be lower than the qualification rate.</p> <p>Misc. Administration and Program Specialist (Series 0301): HM applied for promotions at a rate of 1.57%; this rate exceeds the 1.37% participation rate of HM in the occupational series. HM were found qualified for the position at a rate of 0.00%, which is lower than their representation rate in the applicant pool. Their selection rate of 0.00% is the same as their representation rate in the</p>



	<p>qualified pool. Such a result suggests that the agency should further examine the selection process, including the qualification standards and interview practices, to identify what is causing the qualification and selection rates to be lower than the application rate.</p> <ol style="list-style-type: none"> <li>3. Management/Program Analyst (Series 0343): HM applied for promotions at a rate of 2.26%; this rate exceeds the 2.02% participation rate of HM in the occupational series. HM were found qualified for the position at a rate of 0.79%, which is lower than their representation rate in the applicant pool. Their selection rate of 0.00% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the selection process, including the qualification standards and interview practices, to identify what is causing the qualification and selection rates to be lower than the application rate.</li> <li>4. General Biological Science (RESEARCH) (Series 401): HM applied for promotions at a rate of 1.90%; this rate exceeds the 1.62% participation rate of HM in the occupational series. HM were found qualified for the position at a rate of 1.52, which is lower than their representation rate in the applicant pool. Their selection rate of 5.00% is higher than expected based on their representation rate in the qualified pool, so there does not appear to be any barrier.</li> <li>5. Environmental Engineer (RESEARCH) (Series 819): HM applied for promotions at a rate of 6.25%; this rate exceeds the 5.34% participation rate of HM in the occupational series. HM were found qualified for the position at a rate of 2.27%, which is lower than their representation rate in the applicant pool. Their selection rate of 0.00% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the selection process, including the qualification standards and interview practices, to identify what is causing the qualification and selection rates to be lower than the application rate.</li> <li>6. Physical Scientist/Environmental Scientist (Series 1301): HM applied for promotions at a rate of 6.94%; this rate exceeds the 3.03% participation rate of HM in the occupational series. HM were found qualified for the position at a rate of 6.78%, which is slightly lower than their representation rate in the applicant pool. Their selection rate of 0.00% is lower than expected based on their representation rate in the qualified pool. Such a result suggests that the agency should further examine the selection process, including the qualification standards and interview practices, to identify what is causing the qualification and selection rates to be lower than the application rate.</li> </ol> <p>Based on this demographic snapshot and analysis, it appears that EPA generally has been successful in recruiting Hispanic Males for its major occupations, because the representation of Hispanic Males in the applicant pool for promotions in EPA's major occupations generally exceeds their participation rates in these occupations. Notwithstanding this apparent</p>
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	<p>success, the EPA will continue to monitor the impact of its recruitment efforts with regard to internal competitive promotions.</p> <p>This information is useful and provides the Office of Civil Rights staff with more direction regarding what parts of the promotion process require closer examination in order to allow the agency to identify any, policy, practice or procedure that may be a barrier to equal employment opportunity. For example, one issue requiring further examination is when the promotion rate appears to be lower than the selection rate, e.g., in occupational series 0028, 0301, 0343, 0819 and 1301; in such cases the agency will review the selection process, including qualification criteria and interview practices. It is noted that in previous reports, the EPA included attorneys (series 0905) in the category of major occupations and that information is reflected on the attached tables. However, data regarding internal competitive promotion was not available. As a result, EPA is unable to analyze applicant flow data at this time but will plan on gathering such information for future reports if attorneys continued to be mission critical occupation.</p> <p>Moreover, in future reports, the agency will examine all mission critical occupations, (including occupational series 0028, 0401, 0819 and 1301), to determine whether there are any other triggers for Hispanic males with respect to the internal competitive promotion process. Unfortunately, the agency experienced technical challenges associated with gathering such data in sufficient time for analysis and discussion in this report, but will shift its focus from major occupations to mission critical occupations in the next report.</p> <p>Prior to conducting a statistical analysis based on the promotion rate for major occupations, the agency conducted a focus group with EPA employees concerning Hispanic employment to identify perceptions about opportunities within the agency. Some of the employees attending this session shared their perceptions that managers are reluctant to entrust an employee who was hired through a diversity student program or diversity job fair with important responsibilities and tasks, thereby limiting these employees' opportunities for advancement.</p> <p>In addition, because this listening session was conducted prior to an in-depth analysis of promotions, it may be necessary to conduct additional climate surveys tailored to those parts of the selections process requiring additional examination.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible to identify the promotion process policy, practice or procedure (including the qualifications standards and interviews), associated with occupational series 0028, 0343, 0401, 0819 and 1301 for Hispanic Males. Based on the preliminary analysis of the data, the civil rights office will continue its analysis of promotions for Hispanic Males. Similarly, without a data collection system capable of collecting data associated with developmental opportunities by race, sex and national origin, it is not possible for the agency to analyze whether there are any barriers.</p>

<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Using the applicant flow data associated with promotions for the agency's major occupations, the agency will continue to evaluate the promotion process, including selection criteria and interview practices, in an attempt to identify the policy, practice or procedure which may be causing a lower than expected selection rate for Hispanic Males in occupational series 0028, 0301, 0343, 0819, and 1301.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>November 30, 2010</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>September 30, 2013</p>

<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Human Resources, and Director of Office of Civil Rights will identify the policy, practice or procedure that may have caused Hispanic Males to appear to be selected for internal competitive promotions at a rate lower than their representation rate in the list of qualified candidates, (e.g., occupational series 0028, 0301, and 0343), and lower than their representation rate in the pool of candidates found qualified for the internal competitive promotions, (e.g., series 0028, 0343, 0401, 0819 and 1301), and will examine the participation rates of Hispanic males in other mission critical occupations. The agency's plan includes the following actions:</p> <ol style="list-style-type: none"> <li>1. Identification of HR staffing specialist with expertise regarding the internal competitive promotion process.</li> <li>2. Identification of a sample of managers who have made internal competitive promotions for the relevant occupations.</li> <li>3. Interviews of the HR staffing specialist and Managers about the policies, practices and procedures used.</li> <li>4. Obtaining data associated with the use of each policy, practice or procedure associated with the selection process for internal competitive promotions.</li> <li>5. Conducting a statistical analysis regarding the use of the relevant policy, practice or procedure.</li> <li>6. Evaluating whether alternative policy, practice or procedure achieve the same business objective and is legally permissible to implement.</li> </ol>	<ol style="list-style-type: none"> <li>1. February 28, 2011</li> <li>2. March 30, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> <li>5. January 30, 2012</li> <li>6. September 30, 2013</li> </ol>
<p>Develop and implement a plan for assessing whether there are attitudinal barriers to advancement opportunities, including competitive internal promotions, assignments and training.</p>	<p>June 30, 2011</p>
<p>Directors of Human Resource, Executive Resources Division and Civil Rights will develop a plan to identify all developmental opportunities for which applicant flow data may be available, (e.g., temporary competitive details and leadership training or programs) and to make applicant flow data related to such developmental opportunities readily available to allow the agency to conduct a barrier analysis.</p>	<p>October 30, 2011</p>
<p>Implement the plan and begin capturing applicant flow data collection for developmental opportunities.</p>	<p>October 30, 2012</p>
<p>The National Hispanic Employment Program Manager will analyze applicant flow data for developmental opportunities to determine whether there are any barriers to equal employment opportunity.</p>	<p>October 30, 2012</p>

## REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. The continued cooperation between the OCR and OHR also should allow the agency to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The National Hispanic Employment Program Manager held brown bag/listening sessions with employees from each of the organizations in EPA's Headquarters building to discuss their perceptions regarding the hiring process within the EPA. In addition, several of EPA's regional Hispanic Employment Program Managers also conducted regular meetings and brown bag sessions with employees.

The Agency's Office of Small Business Programs oversees the agency's Minority Academic Institutions Program. In FY 2010, Administrator Jackson signed a Memorandum of Understanding between EPA and the Hispanic Association of Colleges and Universities, which complemented the EPA Memorandum of Understanding with the League of United Latin American Citizens that was extended in FY 2009. In addition to these initiatives, EPA regions continue to partner with Hispanic Serving Institutions, college and student Hispanic and Latino advocacy groups at colleges and universities across the country, and Hispanic and Latino advocacy organizations and professional organizations in an effort to expand the applicant pools. The EPA also continues to attend community events, job fairs and similar activities to promote employment opportunities within the agency.

The National Hispanic Employment Program Manager developed and presented an outline of the key components of the Hispanic Employment Program at the annual developmental training in July 2010. As a result of the training, several regions have increased their outreach and recruitment efforts. In addition, the Administrator signed a new Memorandum of Understanding agreement with the Hispanic Association of Colleges and Universities.

Twelve EPA senior managers attended the Latino Educational Science Technology Engineering and Mathematics (STEM) Conference on April 1, 2010. The event brought STEM experts and leaders from the federal government and private sector to find ways to involve more Latino students in the STEM fields.

The EPA Administrator participated in a roundtable discussion with over 25 national Hispanic organizations.

ENVIRONMENTAL  
PROTECTION AGENCY

**Females in the Senior Executive Service**

FY 2010

60IPage

**STATEMENT OF  
CONDITION THAT WAS A  
TRIGGER FOR A  
POTENTIAL BARRIER:**

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Women comprise 50.48% of EPA workforce, but comprise 39.63% of the Senior Executive Service (SES) workforce.

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

In light of the trigger identified by comparing Tables A4 and AI, the agency attempted to examine the applicant flow data for SES positions.

It became apparent as the agency attempted to create Table AI that the agency does not capture applicant flow data electronically for SES selections. SES applications are processed manually during the selection process by the EPA. As a result, applicant flow data is not readily available which impedes the agency's ability to conduct an appropriate barrier analysis.

The agency next examined whether women are being promoted into SES positions. Women comprise 39.63% of EPA's SES positions, which is lower than expected in light of their 41.64% participation in GS-15 level positions, (which are the next lower graded positions or expected feeder pools for SES positions).

This data related to the selection process is useful and provides the Office of Civil Rights staff with more direction and suggests that the agency should further examine the participation rates of women in agency SES candidate development programs and, if necessary, develop a plan for capturing such data in order to analyze whether a SES candidate development program policy, practice or procedure may be a barrier to women's participation rates in the SES.

**STATEMENT OF  
IDENTIFIED BARRIER:**

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

At this time, it is not possible to identify the hiring and promotion process policy, practice or procedure that may be causing the lower than expected participation rate for women in SES positions. However, the agency will continue its efforts to develop an automated system to capture SES applications and to capture data regarding participation rates of women in SES candidate development programs.

<b>OBJECTIVE:</b>  State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	Continue developing an automated system for collecting applicant flow data for senior executive positions and develop a plan for collecting or analyzing the participation rates of women in senior executive candidate development programs.
<b>RESPONSIBLE OFFICIALS:</b>	Director of Human Resources Director of Office of Civil Rights Director of Executive Resources Division
<b>DATE OBJECTIVE INITIATED:</b>	December 1, 2010
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2011

<b>EEOC FORM 715-01 Barrier PART I - 5</b>	<b>EEO Plan To Eliminate Identified</b>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
Directors of Human Resources, Executive Resources Division, and Civil Rights will meet to discuss the current processes for collecting applicant flow data for SES positions and for SES candidate development programs.	March 1, 2011
Directors of Human Resource, Executive Resources Division, and Civil Rights will develop a plan for making applicant flow data for SES positions and participation rates for SES candidate development programs readily accessible and available to allow the agency to conduct a barrier analysis.	September 30, 2011
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE</b>	
Directors of Civil Rights, Human Resources and Executive Resources Division met to discuss how to address the issue identified in the 2009 report regarding an apparent lack of applicant flow data for senior executive positions. As a result of this discussion, the Director of the Executive Resources Division, the Director of the Information Technology Services, and the Director of the Office of Civil Rights began the process of acquiring the contract and technical expertise to allow the applications for SES positions to be electronically tracked. It is anticipated that this process will be completed by September 30, 2011.	



<b>EEOC FORM 715-01 PART 1- 6</b>	<i>U.S. Equal Employment Opportunity Commission</i> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>White Females in Senior Level Positions</b>	<b>FY 2010</b>
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>According to workforce data (Table A4), although the EPA workforce was comprised of 50.48% women in Fiscal Year (FY) 2010, women comprised only 48.66% of GS-13, 45.26% of GS-14 and 41.64% of GS-15 level positions.</p>	
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency began the process of analyzing women's internal selection rates for senior positions, (GS-13, 14 and 15), by race and ethnicity (Table A11) and comparing this data to the participation rates for general schedule (GS) grades by race and ethnicity (Table A4).</p> <p>The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below. The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <p>As is evident from the data in Table A1 1, there were approximately 300 vacancies at each grade level filled. This is not a significant number of opportunities when viewed as a segment of the overall EPA workforce. The agency recognizes that small sample sizes have the potential to distort statistical results, but the agency elected to use these small numbers in a further effort to refine the trigger identification process.</p> <p>An initial comparison of Table A4 to A1 1 suggested that there were no barriers to women's internal selections for senior level positions, (GS-13, GS-14 and GS-15), because the representation rate of women in the pool of internal selections for senior level positions exceeds the representation rate of women in the feeder pool and/or the next lower grade. More precisely, the data reflected the following:</p> <ol style="list-style-type: none"> <li>Overall, women comprised 63.87% of the GS-12 level positions in the EPA workforce and were selected for GS-13 level positions at</li> </ol>	

	<p>the rate of 71.43%.</p> <ol style="list-style-type: none"> <li>Overall, women comprised 48.86% of the GS-13 positions in the EPA workforce and were selected for GS-14 level positions at the rate of 63.27%.</li> <li>Overall, women comprised 45.26% of the GS-14 level positions in the EPA workforce and were selected for GS-15 level positions at the rate of 56.82%.</li> </ol> <p>However, these results were not consistent across all racial and ethnic categories.</p> <p>For ease of presentation, the agency created separate Part I Forms by race and/or ethnicity category for each group of Women regarding internal selections for senior level positions (GS-13, GS-14 and GS-15) and a separate Part I Form for Senior Executive Service (SES) positions.</p> <p>The data pertaining to internal selections for senior level positions for White Females revealed the following:</p> <p>White Females (WF)</p> <ul style="list-style-type: none"> <li>At the GS-13 level, WF applied for GS-13 level positions at the rate of 28.48%; this rate was less than the 32.29% participation rate of WF in EPA positions at the GS-12 level or feeder pool. WF were found qualified for positions at the rate of 31.09% and were selected at the rate of 44.90%. Such a result suggests that there is no barrier for WF with regard to selection process for GS-13 level positions, but the agency should further examine what recruitment policy, practice or procedure may be causing the application rate to be lower than the participation rate of WF at the next lower grade.</li> <li>At the GS-14 level, WF applied for GS-14 level positions at the rate of 23.05%; this rate was less than the 30.13% participation rate of WF in EPA positions at the GS-13 level or the feeder pool. WF were found qualified for positions at the rate of 26.88% and were selected at a rate of 42.86%. Such a result suggests that there is no barrier for WF with regard to GS-14 level positions, but the agency should further examine what recruitment policy, practice or procedure may be causing the application rate to be lower than the participation rate of WF at the next lower grade.</li> <li>At the GS-15 level, WF applied for GS-15 level positions at the rate of 40.75%; this rate exceeded the 30.55% participation rate of WF in EPA positions at the GS-14 level or the feeder pool. WF were found qualified for positions at the rate of 40.09% and were selected at the rate of 36.36%. Such a result suggests that the agency should conduct a further examination of the selection process, (including the interviews), to identify what is causing the selection rate for WF to be lower than the feeder pool and qualification rates.</li> </ul> <p>The EPA recognizes that not every major occupational series within the agency has the potential for career advancement opportunities to senior level positions (GS-13, GS-14 and GS-15). Therefore, in future reports, the agency will further attempt to refine its preliminary analysis by considering the issue with respect to the senior level grades by occupational series. For</p>
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	<p>example, based on the current demographic snapshot, it appears that there is no barrier to WF being selected for GS-13 and GS-14 level positions, but EPA should further examine the data by occupational series to determine the cause of WF's application rate being lower than the representation rate of WF in the feeder pool or next lower grade. Similarly, the EPA will further examine the data by occupational series to determine the cause of WF's application and selection rates being lower than the representation rate of WF in feeder pool or GS-14 level positions and the applicant pool for GS-15 level positions.</p> <p>The current data collection system does not contain a report that would provide both applicant flow data for senior level positions by race and ethnicity as well as by occupational series. However, the agency will gather and analyze such data in next year's report.</p> <p>Until the agency acquires a data collection system capable of capturing the applicant flow data related to competitive developmental opportunities, there is not a means of evaluating the accuracy of this perception. The EPA's plans for gathering such information are reflected in the PART I Forms related to internal competitive promotions.</p> <p>Additionally, the agency plans to market and hold more training sessions designed to afford all employees with the ability to improve their skills as a means of making themselves more competitive for advancement opportunities.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible to identify the recruitment and selection, (including interview practices), policy, process or procedure which may be causing the lower than expected qualification rates for White Females for GS-13, GS-14 and GS-15 level positions and a lower than expected selection rate for White Females for GS-15 level positions. Based on the preliminary analysis of the data, the civil rights office will continue its analysis of the selection process, including interview practices, associated with White Females in senior level positions.</p>
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Using the applicant flow data associated with the internal recruitment and selection process for senior level positions as it pertains to White Females in terms of the agency's major occupations, the agency will continue to evaluate the selection process, including interview practices, associated with senior level positions in an attempt to identify the policy, practice or procedure which may be causing the lower than expected application rate for White Females for GS-13, GS-14 and GS-15 level positions and lower than expected selection rate for White Females for GS-15 level positions.</p>
<p><b>RESPONSIBLE OFFICIALS:</b></p>	<p>EPA Senior Leaders Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>January 10, 2010</p>

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**TARGET DATE FOR  
COMPLETION OF  
OBJECTIVE:**

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September 30, 2012

<b>EEOC FORM 715-01 Barrier PART 1-6</b>	<b>EEO Plan To Eliminate Identified</b>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Human Resources, and Director of Office of Civil Rights will identify the policy, practice or procedure that may have caused White Females to appear to apply for senior level positions (i.e., for GS-13, GS-14 and GS-15 level positions), at a rate lower than their representation at the next lower grade and to be internally selected for senior level positions, (i.e., for GS-15 level positions), at a rate lower than their representation rate in the applicant pool. The agency's plan includes the following actions:</p> <ol style="list-style-type: none"> <li>7. Identification of HR staffing specialist with expertise regarding the internal selection process for senior level positions.</li> <li>8. Identification of a sample of managers who have made internal selections for senior level positions.</li> <li>9. Interviews of the HR staffing specialist and Managers about the policies, practices and procedures used.</li> <li>10. Obtaining data associated with the use of each policy, practice or procedure associated with the internal selection process for senior level positions.</li> <li>11. Conducting a statistical analysis regarding the use of the relevant policy, practice or procedure.</li> <li>12. Evaluating whether alternative policy, practice or procedure achieve the same business objective and is legally permissible to implement.</li> </ol>	<ol style="list-style-type: none"> <li>1. February 28, 2011</li> <li>2. March 30, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> <li>5. January 30, 2012</li> <li>6. September 30, 2013</li> </ol>
<p>The Office of Human Resources, in consultation with the training offices and the Special Emphasis Program Managers, will develop a plan to discuss marketing strategies and to provide additional training to employees regarding mentors, creating an individual development plan, inter-generational communication, anti-discrimination policies and procedures, interpersonal relationship and developing leadership potential.</p>	<p>June 30, 2011</p>
<p>The Office of Human Resources, in consultation with the training offices and the Special Emphasis Program Managers, will provide management training on their duties and responsibilities in accordance with 29 CFR 1614.102 and EEOC Management Directive 715.</p>	<p>June 30, 2011</p>
<p>Develop a plan for assessing whether there are attitudinal barriers to advancement opportunities and hold quarterly listening sessions.</p>	<p>December 30, 2011</p>

## **REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

The Director of Civil Rights presented a state of EEO address to EPA's senior executives. A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. As a result of these discussions, the Office of Civil Rights and the Office of Human Resources were able to produce applicant flow associated with internal competitive promotions for this report. The continued cooperation between the offices should allow the EPA to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The EPA revised and marketed its online library of training courses made available to employees. As a result, thousands of professional development, training, and professional certification courses are available to EPA employees at any time through Skillport.

<b>EEOC FORM 715-01 PART I - 7</b>	<b><i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>Black Females in Senior Level Positions</b> <span style="float: right;">FY 2010</span>	
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>According to workforce data (Table A4), although the EPA workforce was comprised of 50.48% women in Fiscal Year (FY) 2010, women comprised only 48.66% of GS-13, 45.26% of GS-14 and 41.64% of GS-15 level positions.</p>	
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency began the process of analyzing women's internal selection rates for senior positions, (GS-13, 14 and 15), by race and ethnicity (Table AI 1) and comparing this data to the participation rates for general schedule (GS) grades by race and ethnicity (Table A4).</p> <p>The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below. The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <p>As is evident from the data in Table AI 1, there were approximately 300 vacancies at each grade level filled, which was not a significant number of opportunities when viewed as a segment of the overall EPA workforce. The agency recognizes that small sample sizes have the potential to distort statistical results, but the agency elected to use these small numbers in a further effort to refine the trigger identification process.</p> <p>An initial comparison of Table A4 to AI 1 suggested that there were no barriers to women's internal selections for senior level positions, (GS-13, GS-14, and GS-15), because the representation rate of women in the pool of internal selections for senior level positions exceeds the representation rate of women in the feeder pool and/or the next lower grade. More precisely, the data reflected the following:</p>	

	<ol style="list-style-type: none"> <li>1. Women comprised 63.87% of the GS-12 level positions in the EPA workforce and were selected for GS-13 level positions at the rate of 71.43%.</li> <li>2. Women comprised 48.86% of the GS-13 positions in the EPA workforce, and were selected for GS-14 level positions at the rate of 63.27%.</li> <li>3. Women comprised 45.26% of the GS-14 level positions in the EPA workforce, and were selected for GS-15 level positions at the rate of 56.82%.</li> </ol> <p>However, these results were not consistent across all racial and ethnic groups.</p> <p>For ease of presentation, the agency created separate Part I Forms by race and/or ethnicity category for each group of Women regarding internal selections for senior level positions (GS-13, GS-14 and GS-15) and a separate Part I Form for Senior Executive Service (SES) positions.</p> <p>The data pertaining to internal selections for senior level positions for Black Females revealed the following:</p> <p>Black Females (BF)</p> <ul style="list-style-type: none"> <li>• At the GS-13 level, BF applied for GS-13 level positions at the rate of 21.36%; this rate was less than the 21.58% participation rate of BF in EPA positions at the GS-12 level or feeder pool. BF were found qualified for positions at the rate of 23.32% and were selected at the rate of 18.37%. Such a result suggests the agency should further examine the selection policy, practice or procedure that may be causing the selection rate to be lower than the application rate of BF. Although there is a difference between the application rate of BF and their representation rate in the next lower grade, it was not a notable difference, so the agency will continue to monitor this issue but will not plan activities to address the issue.</li> <li>• At the GS-14 level, BF applied for GS-14 level positions at the rate of 11.98%; this rate exceeded the 11.57% participation rate of BF in EPA positions at the GS-13 level or the feeder pool. BF were found qualified for positions at the rate of 9.49% and were selected at a rate of 12.24%. Such a result suggests that there is no barrier for BF with regard to recruitment or selection, because the application and selection rates for BF exceeds their participation at the next lower grade and application rates. However, the agency should examine the qualification standard policy, practice or procedure that may be causing the qualification rate of BF to be lower than their application rate.</li> <li>• At the GS-15 level, BF applied for GS-15 level positions at the rate of 7.19%; this rate was lower than the 9.11% participation rate of BF in EPA positions at the GS-14 level or the feeder pool. BF were found qualified for positions at the rate of 7.21%, and were selected at the rate of 6.82%. Although there is a difference between the application rate of BF and their representation rate in the next lower grade, it is not a notable difference, so the agency will continue to monitor this issue but will not plan activities to address the issue.</li> </ul>
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	<p>The EPA recognizes that not every major occupational series within the agency has the potential for career advancement opportunities to senior level positions (GS-13, GS-14 and GS-15). Therefore, in future reports, the agency will further attempt to refine its preliminary analysis by considering the issue with respect to the senior level grades by occupational series. For example, based on the current demographic snapshot, it appears that there is no barrier to BF applying for GS-13 and GS-14 level positions, because they apply for such positions at rates exceeding their representation in the feeder pools or the next lower grades. However, the EPA should further examine the data by occupational series to determine the cause of BF's selections rate being lower than their application rates, (e.g., GS-13 and GS-15 level positions). Similarly, the EPA should further examine the data by occupational series to determine the cause of BF's qualification rate being lower than their application rate with regard to GS-14 level positions.</p> <p>The current data collection system does not automatically include the production of a preloaded report containing both the applicant flow data for senior level positions by race and ethnicity as well as by occupational series. However, the agency will gather and analyze such data in next year's report.</p> <p>As another means of identifying potential causes for the statistical results, the EPA conducted a series of listening sessions with groups of female employees. Some of the general perceptions shared by participants as possibly being the cause of lower than expected female representation in senior level positions in the agency were as follows:</p> <ul style="list-style-type: none"> <li>• Insufficient developmental leadership opportunities to allow women to evaluate their own leadership potential.</li> <li>• Lack of awareness about development opportunities and creating an Individual Development Plan.</li> <li>• Lack of opportunities to form mentor relationships.</li> <li>• Possible attitudinal barriers, including intergenerational conflicts and tensions.</li> <li>• Lack of uniform and consistent reward system.</li> <li>• The need for additional training for managers regarding preventing hostile work environment harassment.</li> </ul> <p>The EPA plans to gather information about developmental opportunities as reflected in the PART I Forms related to internal competitive promotions. Additionally, the agency plans to market and hold more training sessions designed to afford all employees with the ability to improve their skills as a means of making themselves more competitive for advancement opportunities.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible to identify the recruitment and selection, (including interview practices), policy, process or procedure which may be causing the lower than expected qualification rates for Black Females for GS-14 positions and the lower than expected selection rates for Black Females for GS-13 and GS-15 level positions. Based on the preliminary analysis of the data, the civil rights office will continue its analysis of the selection process, including interview practices, associated with Black Females in senior level positions.</p>

<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Using the applicant flow data associated with the internal recruitment and selection process by the agency's major occupations, the agency will evaluate the recruitment and selection process in an attempt to identify the policy, practice or procedure which may be causing the lower than expected qualification rates for Black Females for GS-14 positions and lower than expected selection rates for Black Females for GS-13 and GS-15 level positions.</p>
<p><b>RESPONSIBLE OFFICIALS:</b></p>	<p>EPA Senior Leaders Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>January 10, 2011</p>
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>September 30, 2012</p>

<b>EEOC FORM 715-01 Barrier PART I-7</b>	<b>EEO Plan To Eliminate Identified</b>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Human Resources, and Director of Office of Civil Rights will identify the policy, practice or procedure that may have caused Black Females to appear to have been found qualified for GS-14 positions at a rate lower than their application rate, and to appear to have been selected for GS-13 and GS-15 level positions at a rate lower than their application rate. The agency's plan includes the following actions:</p> <ol style="list-style-type: none"> <li>1. Identification of HR staffing specialist with expertise regarding the internal selection process for senior level positions.</li> <li>2. Identification of a sample of managers who have made internal selections for senior level positions.</li> <li>3. Interviews of the HR staffing specialist and Managers about the policies, practices and procedures used.</li> <li>4. Obtaining data associated with the use of each policy, practice or procedure associated with the internal selection process for senior level positions.</li> <li>5. Conducting a statistical analysis regarding the use of the relevant policy, practice or procedure.</li> <li>6. Evaluating whether alternative policy, practice or procedure achieve the same business objective and is legally permissible to implement</li> </ol>	<ol style="list-style-type: none"> <li>1. February 28, 2011</li> <li>2. March 30, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> <li>5. January 30, 2012</li> <li>6. September 30, 2013</li> </ol>
<p>The Office of Human Resources, in consultation with the training offices and the Special Emphasis Program Managers, will develop a plan to discuss marketing strategies and to provide additional training to employees regarding mentors, creating an individual development plan, inter-generational communication, anti-discrimination policies and procedures, interpersonal relationship and developing leadership potential.</p>	<p>June 30, 2011</p>
<p>The Office of Human Resources, in consultation with the training offices and the Special Emphasis Program Managers, will provide management training on their duties and responsibilities in accordance with 29 CFR 1614.102 and EEOC Management Directive 715.</p>	<p>June 30, 2011</p>
<p>Develop a plan for assessing whether there are attitudinal barriers to advancement opportunities and hold quarterly listening sessions.</p>	<p>December 30, 2011</p>

## **REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

The Director of Civil Rights presented a state of EEO address to EPA's senior executives. A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. As a result of these discussions, the Office of Civil Rights and the Office of Human Resources were able to produce applicant flow associated with internal competitive promotions for this report. The continued cooperation between the offices should allow the EPA to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The National Black Employee Program Manager held a brown bag session with 2 employees from each of the organizations in EPA's Headquarters building to discuss their perceptions regarding promotions within the EPA. Also, the Regional BEP Managers held brownbag sessions and events.

The EPA held numerous activities in support of the Black Employment Program. In the fall of 2010, the agency hosted Julian Bond who spoke on race relations, and EPA Regions hosted a variety of events. In August 2010, the EPA hosted a National EPA Forum at the Blacks in Government Conference. Senior leadership officials in attendance (Deputy Regional Administrator, Region 7; Associate Assistant Administrator, Office of Outreach, Diversity and Collaboration; Director, Office of Civil Rights and EEO Officer, Region 7).

The agency entered in a Memorandum of Understanding with Vermont Law School to help develop environmental law capacity at North Carolina Central University Law School (which is a Historically Black College or University). EPA also launched a Collegiate Environmental Sustainability Initiative to increase outreach efforts and financial support to HBCUs.

The EPA revised and marketed its online library of training courses made available to employees. As a result, thousands of professional development, training, and professional certification courses are available to EPA employees at any time through Skillport.

<b>EEOC FORM 715-01 PART I - 8</b>	<b><i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>Hispanic Females in Senior Level Positions</b> <span style="float: right;">FY 2010</span>
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>According to workforce data (Table A4), although the EPA workforce was comprised of 50.48% women in Fiscal Year (FY) 2010, women comprised only 48.66% of GS-13, 45.26% of GS-14 and 41.64% of GS-15 level positions.</p>
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency began the process of analyzing women's internal selection rates for senior positions, (GS-13, 14 and 15), by race and ethnicity (Table AII) and comparing this data to the participation rates for general schedule (GS) grades by race and ethnicity (Table A4).</p> <p>The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below. The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <p>As is evident from the data in Table AII, there were approximately 300 vacancies at each grade level filled, which was not a significant number of opportunities when viewed as a segment of the overall EPA workforce. The agency recognizes that small sample sizes have the potential to distort statistical results, but the agency elected to use these small numbers in a further effort to refine the trigger identification process.</p> <p>An initial comparison of Table A4 to AI 1 suggested that there were no barriers to women's internal selections for senior level positions, (GS-13, GS-14, and GS-15), because the representation rate of women in the pool of internal selections for senior level positions exceeds the representation rate of women in the feeder pool and/or the next lower grade. More precisely, the data reflected the following:</p>

	<ol style="list-style-type: none"> <li>1. Women comprised 63.87% of the GS-12 level positions in the EPA workforce and were selected for GS-13 level positions at the rate of 71.43%.</li> <li>2. Women comprised 48.86% of the GS-13 positions in the EPA workforce, and were selected for GS-14 level positions at the rate of 63.27%.</li> <li>3. Women comprised 45.26% of the GS-14 level positions in the EPA workforce, and were selected for GS-15 level positions at the rate of 56.82%.</li> </ol> <p>However, these results were not consistent across all racial and ethnic categories.</p> <p>For ease of presentation, the agency created separate Part I Forms by race and/or ethnicity category for each group of Women regarding internal selections for senior level positions (GS-13, GS-14 and GS-15) and a separate Part I Form for Senior Executive Service (SES) positions.</p> <p>The data pertaining to internal selections for senior level positions for Hispanic Females revealed the following:</p> <p>Hispanic Females (HF)</p> <ul style="list-style-type: none"> <li>• At the GS-13 level, HF applied for GS-13 level positions at the rate of 2.48%; this rate is less than the 4.69% participation rate of HF in EPA positions at the GS-12 level or feeder pool. HF were found qualified for positions at the rate of 3.11% and were selected at the rate of 2.04%. Such a result suggests the agency should further examine the recruitment and selection process (including the interviews), policy, process or procedure that may be causing application rate to be lower than the participation rate at the next lower grade and the selection rate to be lower than the application rate of HF.</li> <li>• At the GS-14 level, HF applied for GS-14 level positions at the rate of 4.49%; this rate exceeded the 2.55% participation rate of HF in EPA positions at the GS-13 level or the feeder pool. HF were found qualified for positions at the rate of 5.53% and were selected at a rate of 2.04%. Such a result suggests the agency should further examine the selection process, (including the interviews), policy, process or procedure that may be causing the selection rate to be lower than the application rate of HF.</li> <li>• At the GS-15 level, HF applied for GS-15 level positions at the rate of 3.77%; this rate exceeded the 2.00% participation rate of HF in EPA positions at the GS-14 level or the feeder pool. HF were found qualified for positions at the rate of 4.05% and were selected at the rate of 0.00%. Such a result suggests the agency should further examine the selection process, (including the interviews), policy, process or procedure that may be causing the selection rate to be lower than the application rate of HF.</li> </ul> <p>The EPA recognizes that not every major occupational series within the agency has the potential for career advancement opportunities to senior level positions (GS-13, GS-14 and GS-15). Therefore, in future reports, the agency will further attempt to refine its preliminary analysis by considering</p>
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	<p>the issue with respect to the senior level grades by occupational series. For example, based on the current demographic snapshot, it appears that there is no barrier to HF applying for GS-13 and GS-14 level positions, because they apply for such positions at rates exceeding their representation in the feeder pools or the next lower grades. However, the EPA should further examine the data by occupational series to determine the cause of HF's qualification rate being lower than their selection rates for GS-13, GS-14 and GS-15 level positions.</p> <p>The current data collection system does not automatically include the production of a preloaded report containing both the applicant flow data for senior level positions by race and ethnicity as well as by occupational series. However, the agency will gather and analyze such data in next year's report.</p> <p>As another means of identifying potential causes for the statistical results, the EPA conducted a series of listening sessions with groups of female employees. Some of the general perceptions shared by participants as possibly being the cause of female representation in senior level positions in the agency were as follows:</p> <ul style="list-style-type: none"> <li>• Insufficient developmental leadership opportunities to allow women to evaluate their own leadership potential.</li> <li>• Lack of awareness about development opportunities and creating an Individual Development Plan.</li> <li>• Lack of opportunities to form mentor relationships.</li> <li>• Possible attitudinal barriers, including intergenerational conflicts and tensions.</li> <li>• Lack of uniform and consistent reward system.</li> <li>• The need for additional training for managers regarding preventing hostile work environment harassment.</li> </ul> <p>The EPA plans to gather such information about developmental programs as reflected in the PART I Forms related to internal competitive promotions.</p> <p>Additionally, the agency plans to market and hold more training sessions designed to afford all employees with the ability to improve their skills as a means of making themselves more competitive for advancement opportunities.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible to identify the recruitment and selection, (including interview practices), policy, process or procedure which may be causing the lower than expected qualification rates for Hispanic Females in EPA's major occupations. Based on the preliminary analysis of the data, the civil rights office will continue its analysis of the selection process, including interview practices, associated with Hispanic Females in senior level positions.</p>
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy,</p>	<p>Using the applicant flow data associated with the internal recruitment and selection process by the agency's major occupations, the agency will evaluate the recruitment and selection process in an attempt to identify the policy, practice or procedure which may be causing the lower than expected</p>

procedure or practice to be implemented to correct the undesired condition.	selection rates for Hispanic Females for GS-13, GS-14 and GS-15 level positions.
<b>RESPONSIBLE OFFICIALS:</b>	EPA Senior Leaders Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights
<b>DATE OBJECTIVE INITIATED:</b>	January 10, 2010
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2012



<b>EEOC FORM 715-01 Barrier PART I-8</b>	<b>EEO Plan To Eliminate Identified</b>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Human Resources, and Director of Office of Civil Rights will identify the policy, practice or procedure that may have caused Hispanic Females to appear to have been selected for GS-13, GS-14 and GS-15 level positions, in mission critical occupations, at a rate lower than their qualification rate. The agency's plan includes the following actions:</p> <ol style="list-style-type: none"> <li>1. Identification of HR staffing specialist with expertise regarding the internal selection process for senior level positions.</li> <li>2. Identification of a sample of managers who have made internal selections for senior level positions.</li> <li>3. Interviews of the HR staffing specialist and Managers about the policies, practices and procedures used.</li> <li>4. Obtaining data associated with the use of each policy, practice or procedure associated with the internal selection process for senior level positions.</li> <li>5. Conducting a statistical analysis regarding the use of the relevant policy, practice or procedure.</li> <li>6. Evaluating whether alternative policy, practice or procedure achieve the same business objective and is legally permissible to implement.</li> </ol>	<ol style="list-style-type: none"> <li>1. February 28, 2011</li> <li>2. March 30, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> <li>5. January 30, 2012</li> <li>6. September 30, 2013</li> </ol>
<p>The Office of Human Resources, in consultation with the training offices and the Special Emphasis Program Managers, will develop a plan to discuss marketing strategies and to provide additional training to employees regarding mentors, creating an individual development plan, inter-generational communication, anti-discrimination policies and procedures, interpersonal relationship and developing leadership potential.</p>	<p>June 30, 2011</p>
<p>The Office of Human Resources, in consultation with the training offices and the Special Emphasis Program Managers, will provide management training on their duties and responsibilities in accordance with 29 CFR 1614.102 and EEOC Management Directive 715.</p>	<p>June 30, 2011</p>
<p>Develop a plan for assessing whether there are attitudinal barriers to advancement opportunities and hold quarterly listening sessions.</p>	<p>December 30, 2011</p>

## REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. The continued cooperation between the OCR and OHR also should allow the agency to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The National Hispanic Employment Program Manager held brown bag/listening sessions with employees from each of the organizations in EPA's Headquarters building to discuss their perceptions regarding the hiring process within the EPA. In addition, several of EPA's regional Hispanic Employment Program Managers also conducted regular meetings and brown bag sessions with employees.

The Agency's Office of Small Business Programs oversees the agency's Minority Academic Institutions Program. In FY 2010, Administrator Jackson signed a Memorandum of Understanding between EPA and the Hispanic Association of Colleges and Universities, which complemented the EPA Memorandum of Understanding with the League of United Latin American Citizens that was extended in FY 2009. In addition to these initiatives, EPA regions continue to partner with Hispanic Serving Institutions, college and student Hispanic and Latino advocacy groups at colleges and universities across the country and Hispanic and Latino professional organizations in an effort to expand the applicant pools. The EPA also continues to attend community events, job fairs and similar activities to promote employment opportunities within the agency.

The National Hispanic Employment Program Manager developed and presented an outline of the key components of the Hispanic Employment Program at the annual developmental training in July 2010. As a result of the training, several regions have increased their outreach and recruitment efforts. In addition, the Administrator signed a new Memorandum of Understanding agreement with the Hispanic Association of Colleges and Universities.

Twelve EPA senior managers attended the Latino Educational Science Technology Engineering and Mathematics (STEM) Conference on April 1, 2010. The event brought STEM experts and leaders from the federal government and private sector to find ways to involve more Latino students in the STEM fields.

The EPA Administrator participated in a roundtable discussion with over 25 national Hispanic organizations.

<b>EEOC FORM 715-01 PART I - 9</b>	<b><i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>Native American/Hawaiian Females in Senior Level Positions</b> FY 2010
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?</p>	<p>According to workforce data (Table A4), although the EPA workforce was comprised of 50.48% women in Fiscal Year (FY) 2010, women comprised only 48.66% of GS-13, 45.26% of GS-14, and 41.64% of GS-15 level positions.</p>
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency began the process of analyzing women's internal selection rates for senior positions, (GS-13, 14 and 15), by race and ethnicity (Table AI 1) and comparing this data to the participation rates for general schedule (GS) grades by race and ethnicity (Table A4).</p> <p>The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below. The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <p>As is evident from the data in Table AII, there were approximately 300 vacancies at each grade level filled, which was not a significant number of opportunities when viewed as a segment of the overall EPA workforce. The agency recognizes that small sample sizes have the potential to distort statistical results, but the agency elected to use these small numbers in a further effort to refine the trigger identification process.</p> <p>An initial comparison of Table A4 to AII suggested that there were no barriers to women's internal selections for senior level positions, (GS-13, GS-14, and GS-15), because the representation rate of women in the pool of internal selections for senior level positions exceeds the representation rate of women in the feeder pool and/or the next lower grade. More precisely, the data reflected the following:</p>

	<ol style="list-style-type: none"> <li>1. Women comprised 63.87% of the GS-12 level positions in the EPA workforce and were selected for GS-13 level positions at the rate of 71.43%.</li> <li>2. Women comprised 48.86% of the GS-13 positions in the EPA workforce, and were selected for GS-14 level positions at the rate of 63.27%.</li> <li>3. Women comprised 45.26% of the GS-14 level positions in the EPA workforce, and were selected for GS-15 level positions at the rate of 56.82%.</li> </ol> <p>However, these results were not consistent across all race and ethnicity categories.</p> <p>For ease of presentation, the agency created separate Part I Forms by race and/or ethnicity category for each group of Women regarding internal selections for senior level positions (GS-13, GS-14 and GS-15), and a separate Part I Form for Senior Executive Service (SES) positions. The exception to this general formatting approach is that this Part I Form will pertain to both Native Hawaiian or Other Pacific Islander and American Indian or Alaska Native, because of expediency, as well as the relative size of the applicant pools and the overlapping issues.</p> <p>The data pertaining to internal selections for senior level positions revealed the following:</p> <p>Native Hawaiian or Other Pacific Islander Females (NHF/PIF) are not applying for senior level positions (GS-13, 14 or 15). More precisely, NHF/PIF comprised 0.13% of the EPA's GS-12 workforce, 0.06% of the EPA's GS-13 workforce and 0.24% of the EPA's GS-14 workforce, but NHF/PIF are not applying for senior level positions at the same rate that they are participating in the next lower grades or feeder pools.</p> <p>American Indian or Alaska Native Females (AIF/ANF)</p> <ul style="list-style-type: none"> <li>• At the GS-13 level, AIF/ANF applied for GS-13 level positions at the rate of 0.62%; this rate exceeded the 0.40% participation rate of AIF/ANF in EPA positions at the GS-12 level or feeder pool. AIF/ANF were found qualified for positions at the rate of 0.52% and were selected at the rate of 0.00%. Such a result suggests the agency should further examine the selection process, (including the interviews), policy, process or procedure to determine what may be causing the selection rate to be lower than the application rate of AIF/ANF.</li> <li>• At the GS-14 level, AIF/ANF applied for GS-14 level positions at the rate of 0.30%; this rate is lower than the 0.40% participation rate of AIF/ANF in EPA positions at the GS-13 level or the feeder pool. AIF/ANF were found qualified for positions at the rate of 0.40% and were selected at a rate of 0.00%. Such a result suggests the agency should further examine the selection process, (including the interviews), policy, process or procedure that may be causing the selection rate to be lower than the application rate of HF.</li> <li>• At the GS-15 level, AIF/ANF applied for GS-15 level positions at the rate of 0.00%; this rate is less than the 0.44% participation rate of AIF/ANF in EPA positions at the GS-14 level or the feeder pool.</li> </ul>
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	<p>Such a result suggests the agency should further examine the selection process, (including the interviews), policy, process or procedure that may be causing the selection rate to be lower than the application rate of AIF/ANF.</p> <p>The EPA recognizes that not every major occupational series within the agency has the potential for career advancement opportunities to senior level positions (GS-13, GS-14 and GS-15). Therefore, in future reports, the agency will further attempt to refine its preliminary analysis by considering the issue with respect to the senior level grades by occupational series.</p> <p>The current data collection system does not automatically include the production of a preloaded report containing both the applicant flow data for senior level positions by race and ethnicity as well as by occupational series. However, the agency will gather and analyze such data in next year's report. Although there is a difference between the application rate of AIF/ANF and their representation rate in the next lower grade, it is not a notable difference, so the agency will continue to monitor this issue but will not plan activities to address the issue.</p> <p>In light of these small numbers, it is not clear whether further examination of the selection process, (including the interviews), policy, practices or procedure that may be causing the selection rate for AIF/ANF to be lower than their application rates for GS-13, GS-14 and GS-15 level positions will be productive. Nonetheless, the Agency will explore the issue and report on progress in its next report.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>At this time, it is not possible, at this time, to identify the recruitment policy, practice or procedure that may be causing the lower than expected application rate for Native Hawaiian or Other Pacific Islander Females for GS-13, GS-14 and GS-15 level positions, as well as the lower than expected application rate for American Indian/Alaska Native Females for GS-15 level positions. Based on the preliminary analysis of the data, the civil rights office will continue its analysis of the selection process, including interview practices, associated with Native Hawaiian or Other Pacific Islander and American Indian/Alaska Native Females in senior level positions.</p>
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>Using the applicant flow data associated with the internal recruitment and selection process by the agency's major occupations, the agency will evaluate the recruitment and selection process in an attempt to identify the policy, practice or procedure which may be causing the lower than expected selection rates for American Indian/Native Hawaiian Females for GS-13, GS-14 and GS-15 level positions. Additionally, the agency will develop a recruitment plan for Native Hawaiian or Other Pacific Islander Females for GS-13, GS-14 and GS-15 level positions, as well as the lower than expected application rate for American Indian/Alaska Native Females for GS-15 level positions.</p>
<p><b>RESPONSIBLE OFFICIALS:</b></p>	<p>EPA Senior Leaders Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights</p>

<b>DATE OBJECTIVE INITIATED:</b>	January 10, 2010
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2012

<b>EEOC FORM 715-01 Barrier PART I - 9</b>	<b>EEO Plan To Eliminate Identified</b>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration, Director of Human Resources, and Director of Office of Civil Rights will identify the policy, practice or procedure that may have caused American Indian/Native Hawaiian Females to appear to apply for GS-15 positions a rate lower than their representation rate in the next lower grade and appear to have been selected for GS-13, GS-14 and GS-15 level positions at a rate lower than their qualification rate. The agency's plan includes the following actions:</p> <ol style="list-style-type: none"> <li>1. Identification of HR staffing specialist with expertise regarding the internal selection process for senior level positions.</li> <li>2. Identification of a sample of managers who have made internal selections for senior level positions.</li> <li>3. Interviews of the HR staffing specialist and Managers about the policies, practices and procedures used.</li> <li>4. Obtaining data associated with the use of each policy, practice or procedure associated with the internal selection process for senior level positions.</li> <li>5. Conducting a statistical analysis regarding the use of the relevant policy, practice or procedure.</li> <li>6. Evaluating whether alternative policy, practice or procedure achieve the same business objective and is legally permissible to implement.</li> </ol>	<ol style="list-style-type: none"> <li>1. February 28, 2011</li> <li>2. March 30, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> <li>5. January 30, 2012</li> <li>6. September 30, 2013</li> </ol>
<p>The Asian Employment Program and Native American Employment Program Managers will create and maintain an updated list of potential partners affiliated with Native Americans, Native Hawaiians or Other Pacific Islanders, (e.g., professional associations and colleges and universities).</p>	<p>February 28, 2011</p>
<p>The Asian Employment Program Manager and Native American Employment Program will work with the Information Technology Services Division and the Consolidated Service Centers to ensure that the updated list of potential partners affiliated with Native Hawaiians or Other Pacific Islanders is part of the electronic system, e.g. EzHire, by which vacancy announcements are automatically disseminated.</p>	<p>March 15, 2011</p>

## REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE

The Director of Civil Rights presented a state of EEO address to EPA's senior executives. A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. As a result of these discussions, the Office of Civil Rights and the Office of Human Resources were able to produce applicant flow associated with internal competitive promotions for this report. The continued cooperation between the offices should allow the EPA to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The agency conducted several Native American programs during 2010, including an event on Race Relations and Native Americans. The agency worked with the National Tribal Science Council (NTSC), and the American Indian Science and Engineering Society (AISES) to ensure qualified Native American students knew about EPA's internships and job opportunities.

The agency hosted a forum for National EPA Native American Employment Program Managers at the Society of American Indian Government Employees in 2010. The agency hosted a forum for National EPA Asian American Pacific Islander Employment Program Managers at the National Association of Asian American Professionals Conference in San Francisco in 2010.

The EPA revised and marketed its online library of training courses made available to employees. As a result, thousands of professional development, training and professional certification courses are available to EPA employees at any time through Skillport.



<b>EEOC FORM 715-01 PART I -10</b>	<b><i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>Asian Females in Senior Level Positions</b>	<b>FY 2010</b>
<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>According to workforce data (Table A4), although the EPA workforce was comprised of 50.48% women in Fiscal Year (FY) 2010, women comprised only 48.66% of GS-13, 45.26% of GS-14, and 41.64% of GS-15 level positions.</p>	
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	<p>In light of this trigger, the agency began the process of analyzing women's internal selection rates for senior positions, (GS-13, 14 and 15), by race and ethnicity (Table AI 1) and comparing this data to the participation rates for general schedule (GS) grades by race and ethnicity (Table A4).</p> <p>The agency's approach was to compare the participation rate, application rate, qualification rate and selection rate for the agency's major occupations as demonstrated below. The agency recognizes that this approach is different than the one taken in past reports, but is pleased to adopt this approach based on the available applicant flow data. The agency will first focus its efforts on those occupations where there was the greatest difference between the actual and expected participation rates for any group.</p> <p>It should be noted that the agency is using the applicant flow data that currently is available. This data is from April 10, 2010 to September 30, 2010. The agency will continue to improve the quantity and quality of applicant flow data collection processes.</p> <p>As is evident from the data in Table AII, there were approximately 300 vacancies at each grade level filled, which was not a significant number of opportunities when viewed as a segment of the overall EPA workforce. The agency recognizes that small sample sizes have the potential to distort statistical results, but the agency elected to use these small numbers in a further effort to refine the trigger identification process.</p> <p>An initial comparison of Table A4 to AII suggested that there were no barriers to women's internal selections for senior level positions, (GS-13, GS-14 and GS-15), because the representation rate of women in the pool of internal selections for senior level positions exceeds the representation rate of women in the feeder pool and/or the next lower grade. More precisely, the data reflected the following:</p> <ol style="list-style-type: none"> <li>1. Women comprised 63.87% of the GS-12 level positions in the EPA</li> </ol>	

	<p>workforce and were selected for GS-13 level positions at the rate of 71.43%.</p> <p>2. Women comprised 48.86% of the GS-13 positions in the EPA workforce, and were selected for GS-14 level positions at the rate of 63.27%.</p> <p>3. Women comprised 45.26% of the GS-14 level positions in the EPA workforce, and were selected for GS-15 level positions at the rate of 56.82%.</p> <p>However, these results were not consistent across all race and ethnicity categories.</p> <p>For ease of presentation, the agency created separate Part I Forms by race and/or ethnicity category for each group of Women regarding internal selections for senior level positions (GS-13, GS-14 and GS-15) and a separate Part I Form for Senior Executive Service (SES) positions.</p> <p>The data pertaining to internal selections for senior level positions for Asian Females revealed the following:</p> <p>Asian Females (AF)</p> <ul style="list-style-type: none"> <li>At the GS-13 level, AF applied for GS-13 level positions at the rate of 2.48%; this rate is less than the 3.94% participation rate of AF in EPA positions at the GS-12 level or feeder pool. AF were found qualified for positions at the rate of 3.11% and were selected at the rate of 6.12%. Such a result suggests there is no barrier for Asian Females with regard to GS-13 level positions.</li> <li>At the GS-14 level, AF applied for GS-14 level positions at the rate of 3.89%; this rate exceeded the 3.62% participation rate of AF in EPA positions at the GS-13 level or the feeder pool. AF were found qualified for positions at the rate of 3.95% and were selected at a rate of 6.12%. Such a result suggests that there is no barrier for Asian Females with regard to GS-14 level positions.</li> <li>At the GS-15 level, AF applied for GS-15 level positions at the rate of 5.41%; this rate exceeded the 2.92% participation rate of AF in EPA positions at the GS-14 level or the feeder pool. AF were found qualified for positions at the rate of 5.41%, and were selected at the rate of 9.09%. Such a result suggests that there is no barrier for Asian Females with regard to GS-15 level positions.</li> </ul> <p>Although the agency will continue to monitor the selection of AF for internal selections for senior level positions in the future, there are no planned activities based on these statistical results.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>There are no apparent barriers to Asian Females' internal selections for senior level positions (GS-13, GS-14 and GS-15 level positions).</p>

<b>OBJECTIVE:</b>  State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	Although there are no apparent barriers to Asian Females' internal selections for senior level positions (GS-13, GS-14 and GS-15 level positions), the agency will conduct a climate assessment to identify any potential attitudinal barriers and continue to promote training opportunities to allow employees to improve skills in an effort for them to become more competitive for senior level positions.
<b>RESPONSIBLE OFFICIALS:</b>	EPA Senior Leaders Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights
<b>DATE OBJECTIVE INITIATED:</b>	January 10, 2010
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2012

<div> <div>EEOC FORM 715-01</div> <div>EEO Plan To Eliminate Identified Barrier</div> </div>	
PART I-10	
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
Continue to monitor on a quarterly basis the participation rates of Asian Females in senior level positions.	September 30, 2011
Analyze applicant flow data on a quarterly basis for the participation, application, qualification and selection rates for the three most populous mission-critical occupations.	September 30, 2011

## **REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

A new Director of the Office of Civil Rights was permanently appointed in December 2010, and he and the former Director each briefed the Human Resource Council (HRC) regarding the state of EEO issues. As a result of these discussions, the Office of Civil Rights and the Office of Human Resources were able to produce applicant flow associated with internal competitive promotions for this report. The continued cooperation between the offices should allow the EPA to continue to improve the manner in which applicant flow data is collected, reported and analyzed.

The agency hosted a forum for National EPA Asian American Pacific Islander Employment Program Managers at the National Association of Asian American Professional Conference in San Francisco in 2010.

The EPA revised and marketed its online library of training courses made available to employees. As a result, thousands of professional development, training, and professional certification courses are available to EPA employees at any time through Skillport.

EEOC FORM 715-01 PART J		Special U.S. Equal Employment Opportunity FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS					Commission  and Advancement		
PART I		1. Agency		1. U. S. Environmental Protection Agency					
Department or Agency Information	1.a. 2nd Level Component	1.a. n/a							
	1.b. 3rd Level or lower	1.b. n/a							
PART II		Enter Actual		Beginning of FY 2009		End of FY 2010		Net Change	
Employment Trend and Special Recruitment for Individuals With Targeted Disabilities	the:	Number	%	Number		%	Number	Rate of Change	
	Total Work Force	18475	100.00%	18790		100.00%	315	1.71%	
	Reportable Disability	1230	6.65%	1217		6.48%	-13	-1.06%	
	Targeted Disability*	240	1.30%	241		1.28%	1	0.42%	
	* If the rate of change for persons with targeted disabilities change for the total workforce, a barrier analysis		of Applications Received From Targeted Disabilities during the			Data not available			
2.Total Number of Selections of Individuals with during the reporting period.						Data not available			
PART III Participation Rates In		Agency Employment Programs							
Other Employment/ Personnel Programs	TOTAL	Reportable Disability		Targeted Disability		#	Not Identifi	No Disability	
		#	%	#	%			#	%
3. Competitive Promotions	No Data Available								
4. Non-Competitive Promotions	1,672	1148	6.82%	24	1.44%	40	2.39%	1,518	90.79%
5. Employee Career Development		Programs - No Data Available							
5.a. Grades 5 - 12	No Data Available								
5.b. Grades 13 - 14	No Data Available								
5.c. Grade 15/SES	No Data Available								
6. Employee Recognition and Awards									
6.a. Time-Off Awards (Total hrs awarded)	108,083	8,154	7.54%	1,545	1.43%	1,338	1.24%	98,591	91.22%
6.b. Cash Awards (total \$\$\$ awarded)	25,081,805	1,431,36		5,71	0.89%	289,018	1.15%	23,361,437	93.14%
6.c. Quality-Step Increase	1,006	52	5.17%	5	0.50%	14	1.39%	940	93.44%

**Part IV**

Please see attached Forms J-1 and J-2.

Identification and  
Elimination of Barriers

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<b>EEOC FORM 715-01 PART J -1</b>	<b><i>U.S. Equal Employment Opportunity Commission</i> FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>Persons with Targeted Disabilities Applicant Information</b> <span style="float: right;">FY 2010</span>	
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Persons with Targeted Disabilities (PWTD) are represented in the EPA workforce at a rate of 1.34% which is below the EPA's goal of PWTD comprising 2.0% of the agency's workforce.	
<b>BARRIER ANALYSIS:</b>  Provide a description of the steps taken and data analyzed to determine cause of the condition.	<p>The agency uses standard Office of Management and Budget (OMB) form 3046-0046 to gather demographic data, but the form no longer solicits information regarding whether applicants are PWTD. As a result, the agency no longer has applicant flow data for PWTD applicants. Without applicant flow data, it is not possible at this time to analyze whether any agency policy, practice or procedure may be a barrier to the hiring and competitive internal promotion of persons with targeted disabilities.</p> <p>In the absence of applicant flow data, the agency decided to evaluate its recruitment of persons with targeted disabilities. Based on this review, the agency will further strengthen its partnerships with educational, professional and other non-profit entities affiliated with persons with disabilities, (e.g., Workforce Recruitment Program for College Students with Disabilities, professional associations, state vocational rehabilitation centers, disabled veterans, disability advocacy groups and student groups or disability student service offices at colleges and universities), in an effort to expand the applicant pool.</p>	
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	At this time, it is not possible to identify the hiring and promotion process policy, practice or procedure that may be causing the lower than expected participation rate for persons with targeted disabilities, because the agency currently has no method for collecting applicant flow data for persons with targeted disabilities.	
<b>OBJECTIVE:</b>  State the alternative or revised agency policy, procedure or practice to be implemented to correct the	The agency will explore options for collecting applicant flow data for persons with targeted disabilities. In addition, the agency will reevaluate, modify as necessary, and market its recruitment strategy for persons with targeted disabilities.	

undesired condition.	
<b>RESPONSIBLE OFFICIALS:</b>	Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources Director of Office of Civil Rights
<b>DATE OBJECTIVE INITIATED:</b>	October 1, 2010
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2012



<b>EEOC FORM 715-01 Barrier PARTJ-1</b>	<b>EEO Plan To Eliminate Identified</b>
<b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b>	<b>TARGET DATE (Must be specific)</b>
The agency will appoint the senior official required by Section 2C of the executive order dated July 26, 2010, on Increasing Federal Employment of Individuals with Disabilities.	February 15, 2011
The Persons with Disabilities Program Managers will create and maintain an updated list of potential partners affiliated with persons with disabilities, (e.g., Workforce Recruitment Program, professional associations, state vocational rehabilitation centers, disabled veterans, disability advocacy groups and student groups or disability student service offices at colleges and universities).	March 15, 2011
The National Persons with Disabilities Program Manager will work with the Information Technology Services Division and the Consolidated Service Centers to ensure that the updated list of potential partners affiliated with persons with disabilities is part of the electronic system, e.g. EzHire, by which vacancy announcements are automatically disseminated.	March 30, 2011
The Directors of Civil Rights and Human Resources, the Associate Assistant Administrator for Diversity, Outreach and Collaboration as well as the National Persons with Disabilities Program Manager, National Reasonable Accommodation Coordinator, and the National Disability Employment Recruiter will benchmark the manner in which other agencies capture applicant flow data for PWTD.	March 30, 2011
The Directors of Civil Rights and Human Resources, the Associate Assistant Administrator for Diversity, Outreach and Collaboration as well as the National Persons with Disabilities Program Manager, National Reasonable Accommodation Coordinator, and the National Disability Employment Recruiter will develop and implement a plan to capture applicant flow data for PWTD, if feasible.	May 30, 2011
<p>The Directors of Civil Rights and Human Resources, the Associate Assistant Administrator for Diversity, Outreach and Collaboration as well as the National Persons with Disabilities Program Manager, National Reasonable Accommodation Coordinator, and the National Disability Employment Recruiter, will develop an agency-wide recruitment plan for persons with targeted disabilities. This plan will contain dates by which action items must be completed and will address the following issues:</p> <ol style="list-style-type: none"> <li>1. Schedule for evaluating the existing training modules regarding Schedule A hiring and reasonable accommodation to ensure that the training is current and comprehensive.</li> <li>2. Complete any necessary revisions to the training module.</li> <li>3. Establish schedule to offer training to managers regarding Schedule A hiring and begin conducting training sessions.</li> <li>4. Establish a schedule to offer training to managers regarding the reasonable accommodation process and procedures and begin</li> </ol>	<ol style="list-style-type: none"> <li>1. March 30, 2011</li> <li>2. April 15, 2011</li> <li>3. April 30, 2011</li> <li>4. May 30, 2011</li> </ol>

- conducting training sessions.
- |   |                       |
|---|-----------------------|
| 5. Plan to brief employees about the reasonable accommodation process and procedures with appropriate coordination with collective bargaining units.  | 5. June 30, 2011      |
| 6. Evaluation of options for creating a selective placement program for persons with targeted disabilities and plan for implementing such a program.  | 6. August 30, 2011    |
| 7. Schedule for and identification of method by which to resurvey the workforce regarding disability.   | 7. September 1, 2011  |
| 8. Conduct quarterly focus groups/brown bags/listening sessions with employees in an attempt to assess the climate with regard to any attitudinal barriers that may be impacting the ability of persons with disabilities to be hired, promoted or enjoy the benefits/privileges of employment. | 8. September 30, 2011 |

## **REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE**

The Directors of Civil Rights and Human Resources held several meetings in Fiscal Year 2009 to discuss the need and feasibility of creating a recruitment plan. Since these senior leaders agreed to develop a plan and began to discuss the elements of the plan, their staffs have created the outline of activities associated with the above-identified plan. The offices continue to work together to finalize and implement a recruitment plan for persons with targeted disabilities.

The National Persons with Disabilities Program Manager, in conjunction with staff from the Human Resources Office, regularly briefs senior managers throughout EPA headquarters about special hiring authorities including Schedule A. Additionally, training about Schedule A hiring was provided to EEO Officers, and at conferences and/or retreats held by several EPA organizations.

The EPA resurveyed its workforce regarding disability status which resulted in an increase in the number of persons with disabilities represented in the agency's overall workforce.

The EPA revised its reasonable accommodation procedures in light of the Amendments to the Americans with Disabilities Act of 2008 and submitted the revised procedures to the EEOC. Additionally, the EPA reviewed its reasonable accommodation procedures in light of the Genetic Information Nondiscrimination Act (GINA), but no modifications were necessary. However, the National Reasonable Accommodation Coordinator notified all Local Reasonable Accommodation Coordinators of specific language that is used when requesting medical documentation from an employee, applicant or his/her health care provider to comply with the Genetic Information Nondiscrimination Act.

The EPA continues to support the Workforce Recruitment Program (WRP) for college students with disabilities. For example, the National Persons with Disabilities Program Manager and other EPA employees represented the agency as recruiters through the Workforce Recruitment Program. These EPA recruiters visited colleges and universities and interviewed more than 100 students, many of whom were added to the WRP database in 2009.

Additionally, the EPA continues to participate in a number of other job and college fairs in an effort to conduct outreach to the persons with disabilities.

The EPA also co-sponsored the annual Perspectives Conference on the Employment of Individuals with Disabilities in Bethesda, Maryland.

<b>EEOC FORM 715-01 PART J - 2</b>	<i>U.S. Equal Employment Opportunity Commission</i> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>	
<b>ENVIRONMENTAL PROTECTION AGENCY</b>	<b>Persons with Targeted Disabilities Separation Information</b> FY 2010	
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Persons with Targeted Disabilities (PWTD) are represented in the EPA workforce at a rate of 1.34% and are separating from the workforce at a rate of 2.30%.	
<b>BARRIER ANALYSIS:</b>  Provide a description of the steps taken and data analyzed to determine cause of the condition.	Exit interviews are not routinely conducted with separating employees. The agency currently does not have a means or method for evaluating what policy, practice or procedure may be causing persons with targeted disabilities to separate at a higher rate than their representation in the overall EPA workforce.	
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	The agency currently has no method for collecting data related to the reasons why persons with targeted disabilities separate from the agency.	
<b>OBJECTIVE:</b> State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.	The agency will create a plan that includes collecting data from separating persons with targeted disabilities regarding the reason for the separation.	
<b>RESPONSIBLE OFFICIALS:</b>	Associate Assistant Administrator for Diversity, Outreach and Collaboration Director of Human Resources	
<b>DATE OBJECTIVE INITIATED:</b>	December 1, 2010	
<b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b>	September 30, 2012	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:	TARGET DATE (Must be specific)
<p>The Associate Assistant Administrator for Diversity, Outreach and Collaboration and Director of Human Resources as well as the National Persons with Disabilities Program Manager will:</p> <ol style="list-style-type: none"><li>1. Identify and evaluate options, (including exit surveys), for gathering information regarding the reasons why persons with targeted disabilities separate from EPA.</li><li>2. Implement a means of gathering information regarding the causes for separation.</li><li>3. Analyze results of data collected in the tool designed to capture the causes of separation.</li></ol>	<ol style="list-style-type: none"><li>1. May 30, 2011</li><li>2. January 31, 2012</li><li>3. June 30, 2012</li></ol>
<p>The Persons with Disabilities Program Manager, in conjunction with the Office of Human Resources, will conduct three focus groups/brown bags/listening sessions with employees in an attempt to identify issues which may be causing persons with targeted disabilities to separate from the agency at a rate higher than their representation in the agency.</p>	<p>September 30, 2011</p>
<b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE</b>	